



## Ag & Business Legal Strategies

## INVOICE

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Invoice # 2669  
Date: 03/27/2024  
Due Upon Receipt

BDC Group Inc.  
925 Boyson Ct  
Hiawatha, IA 52233

### 6394.00002-BDC - Postpetition

#### Services

Date	Notes	Attorney	Quantity	Rate	Total
10/24/2023	Participate in call with Liz Janeczak, Shelly DeRousse and Abram Carls to review the Unsecured Creditor's Committee's objections to the DIP and the Chapter 11 Plan.	JP	0.80	\$575.00	\$460.00
10/24/2023	Telephone call from Abram Carls regarding status of plan confirmation; DIP Financing and Injunction to Protect President of Debtor.	JP	0.20	\$575.00	\$115.00
10/24/2023	Revise Motion for Entry of Default by Clerk and Motion for Entry of Default Judgment by Judge Collins as it relates to the non-answering and non-appearing defendants in the adversary proceeding seeking to extend the automatic stay against defendants.	JP	0.20	\$575.00	\$115.00
10/24/2023	Review and revise first 600 lines of entries on ABL's second fee application.	JP	1.00	\$575.00	\$575.00
10/25/2023	Email to Marlin Leasing's counsel discussing how the temporary restraining order prohibits the lawsuit he filed for his client against Dennis Bruce.	AP	0.40	\$350.00	\$140.00
10/25/2023	Email BDC Group Inc.'s accountant, Joe Benter, to follow up on the updated invoice. (No Charge).	LJ	0.10	\$0.00	\$0.00
10/25/2023	Respond to emails from Marlin Leasing's counsel discussing support for extending the automatic stay to a Chapter 11 debtor's principal and remote participation arrangements	AP	0.20	\$350.00	\$70.00

for the TRO hearing.

10/25/2023	Update the Request for Defaults, Affidavit Supporting Default Judgments, and Motion for Default Judgments.	AT	0.30	\$170.00	\$51.00
10/25/2023	Review e-mail from Unsecured Creditor's Committee Counsel and forward it with ABLs responses to client for its review.	JP	1.00	\$575.00	\$575.00
10/25/2023	Upload updated invoices from BerganKDV to NetDocuments, convert to pdf, and prepare as Exhibit A to the Accountant Fee App. (No Charge).	LJ	0.40	\$0.00	\$0.00
10/25/2023	Update drafted First Interim Application for Compensation for Debtor's Accountant and its corresponding Notice and Proposed Order to include new information provided by BerganKDV/Creative Planning.	LJ	0.20	\$170.00	\$34.00
10/25/2023	Email First Interim Application for Compensation for Debtor's Accountant and its corresponding Notice and Proposed Order to Attorney Austin Peiffer and Legal Assistant Alex Tvedte. (No Charge).	LJ	0.10	\$0.00	\$0.00
10/25/2023	Review Best Case to see why Dean A. Spina received copies of the Amended Schedules and email Attorney Austin Peiffer to advise that he is listed as an additional notice party for Kirkwood Community College's claim on Schedule D. (No Charge).	LJ	0.10	\$0.00	\$0.00
10/25/2023	Determine why Attorney Dean Spina received BDC's amended schedules and respond to his inquiry about them.	AP	0.10	\$350.00	\$35.00
10/25/2023	Review, edit, and finally approve injunction adversary proceeding default judgment filings.	AP	0.10	\$350.00	\$35.00
10/25/2023	Respond to email from Sheets Sterling's attorney discussing plan injunction against enforcing guaranties.	AP	0.10	\$350.00	\$35.00
10/25/2023	Email to Attorney Joe Peiffer with notes on research on plan injunctions and third-party releases.	AP	0.10	\$350.00	\$35.00
10/25/2023	Research plan injunctions and third-party releases.	AP	0.20	\$350.00	\$70.00
10/26/2023	Weekly plan status update meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank's representatives (joined late).	AP	0.50	\$350.00	\$175.00
10/26/2023	Meeting with Attorney Joe Peiffer and client's principals discussing the Unsecured Creditors Committee's outlined plan objections (interrupted).	AP	0.60	\$350.00	\$210.00
10/26/2023	Email to client's principals discussing today's order granting the Unsecured Creditors Committee's first interim fee application.	AP	0.10	\$350.00	\$35.00
10/26/2023	File the Request for Defaults Against KYF Global Partners and Kyle Enterprises. (No Charge)	AT	0.50	\$0.00	\$0.00

10/26/2023	Emails to client's principals discussing the Unsecured Creditors Committee's fee application and future professional fee escrow payments.	AP	0.10	\$350.00	\$35.00
10/26/2023	Receive email from Austin Peiffer with questions re: Allianz insurance policy; Review Premium Notice sent to Candace Bruce and send email reply.	YH	0.20	\$405.00	\$81.00
10/26/2023	Telephone call with Clerk regarding correct docket events to use for adversary default request filings. (No Charge).	MP	0.10	\$0.00	\$0.00
10/26/2023	Meeting with Austin Peiffer, Todd Shores, Dennis Bruce, Abram Carls and Travis Schroeder to discuss progress on plan negotiations, DIP Financing; revised plan payments involving suggested settlement with Deere and attorney fees for committee.	JP	0.60	\$575.00	\$345.00
10/26/2023	Zoom meeting with Todd Shores, Dennis Bruce and Austin Peiffer to review DIP budget and discuss plan payments as suggested by Abram Carls' discussions with Deere to see how cash flow will work; discussion of adding in the US Trustee fees.	JP	0.60	\$575.00	\$345.00
10/26/2023	Respond to email from United States Trustee's office discussing status of the control agreement.	AP	0.10	\$350.00	\$35.00
10/26/2023	Review e-mail from client regarding Unsecured Creditor's Committee deposits and draft e-mail to Unsecured Creditor's Committee counsel regarding the matter.	JP	0.20	\$575.00	\$115.00
10/26/2023	Review e-mail from Todd Vandenberg of the Office of the United States Trustee and draft responsive e-mail to him regarding the DIP Account with a Control Agreement.	JP	0.10	\$575.00	\$57.50
10/26/2023	Draft e-mail to Attorney Mark Swan regarding Marlin Leasing Dismissal of Lawsuit.	JP	0.10	\$575.00	\$57.50
10/26/2023	Review client file and respond to email from Attorney Austin J. Peiffer regarding Allianz.	SD	0.30	\$170.00	\$51.00
10/27/2023	Meeting with Attorney Joe Peiffer preparing for this afternoon's status hearing, including reviewing items that are being or should be discussed and solidifying client's positions on those issues.	AP	0.40	\$350.00	\$140.00
10/27/2023	Draft letter to client discussing professional fee escrows for the Unsecured Creditors Committee and Ag & Business Legal Strategies.	AP	0.60	\$350.00	\$210.00
10/27/2023	Review proofs of claim and work on calculating projected plan payments under Keystone Savings Bank's proposed revised plan treatment for secured creditors, and request clarification of that proposed treatment.	AP	1.00	\$350.00	\$350.00
10/27/2023	Finalize the Motion for Default Judgments.	AT	0.20	\$170.00	\$34.00
10/27/2023	File the Motion for Default Judgments with Affidavit in the Adversary Case. (No Charge)	AT	0.20	\$0.00	\$0.00

10/27/2023	Revise plan payment analysis for secured debts and leases to incorporate additional information and changed proposed plan treatment since plan was drafted and send to client's principals with comments.	AP	0.70	\$350.00	\$245.00
10/27/2023	Represent client at status conference hearing discussing motion to shorten time to object to plan and disclosure statement, final DIP financing, Keystone Savings Bank's stay relief request, and next week's hearing on the adversary proceeding.	AP	0.80	\$350.00	\$280.00
10/27/2023	Respond to client's emails discussing today's letter and how Ag & Business Legal Strategies can represent client's best interests.	AP	0.30	\$350.00	\$105.00
10/27/2023	Updating First Interim Application for Compensation for Debtor's Accountant.	AT	0.20	\$170.00	\$34.00
10/27/2023	Telephone call to Elizabeth Janczak regarding status of case; funding of fees for the unsecured creditor's committee; potential sale of the Debtor to an outside third party; feasibility in light of bank's refusal to increase the DIP line of credit now; alternative funding of the debtor to allow feasibility.	JP	0.60	\$575.00	\$345.00
10/27/2023	Telephone call to Abram Carls regarding upcoming hearings and how to set up the issue of the extent of Keystone's security interest in the avoidance actions to secure its prepetition indebtedness; status of getting another bank into which BDC's excess deposits can be held.	JP	0.30	\$575.00	\$172.50
10/27/2023	Telephone call to Todd Vandenberg regarding status of setting up a second DIP account with an approved depository.	JP	0.10	\$575.00	\$57.50
10/29/2023	Review bill before submission to bankruptcy court for approval.	JP	1.00	\$575.00	\$575.00
10/29/2023	Draft letter to Dennis Bruce regarding adversary seeking to extend automatic stay to protect client's president.	JP	0.50	\$575.00	\$287.50
10/30/2023	Call with attorney for Breakout Capital and Ally Bank discussing extending time to answer adversary complaint and impending plan objection.	AP	0.10	\$350.00	\$35.00
10/30/2023	Create a spreadsheet for the returned mail for the Amended Schedules.	AT	0.30	\$170.00	\$51.00
10/31/2023	Do research on the new addresses for all of the returned mail that came in yesterday. Get the new labels created and all of the documents prepared for mailing. (No Charge)	AT	0.90	\$0.00	\$0.00
10/31/2023	Review and revise letter to client's principal discussing how to proceed in the adversary proceeding requesting extension of the automatic stay to him.	AP	0.70	\$350.00	\$245.00
10/31/2023	Email to counsel for Keystone Savings Bank and the Unsecured Creditors Committee discussing scheduling	AP	0.20	\$350.00	\$70.00

	evidentiary hearing.				
10/31/2023	Review time entries and clarify activity descriptions. (No Charge).	AP	0.60	\$0.00	\$0.00
10/31/2023	Email to GreenState Credit Union's attorney discussing insurance loss payee information.	AP	0.10	\$350.00	\$35.00
11/01/2023	Review case granting third-party release to a small business owner and revise letter to client's principal in light of that ruling and Attorney Joe Peiffer's revisions.	AP	0.60	\$350.00	\$210.00
11/01/2023	Finish drafting 2nd Fee App for ABLs, Exhibit A, Notice, and Proposed Order for same, and send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
11/01/2023	Final review of, edits to, and approval of Ag & Business Legal Strategies' 2nd interim fee application and related documents.	AP	0.30	\$350.00	\$105.00
11/01/2023	Work on finalizing BerganKDV 1st fee app. Review app and exhibit as drafted; place telephone call to Joe Benter to request detail invoice for 7/5/23 billing.	MP	0.20	\$170.00	\$34.00
11/01/2023	Review client file for information about Manchester Leasing Service lease 1463 and inquire with client's principals about what has happened to this.	AP	0.50	\$350.00	\$175.00
11/01/2023	Return phone call to Robert from SBA regarding loan number so that they can get the amended schedules loaded properly into their system.	MP	0.10	\$170.00	\$17.00
11/01/2023	Finalize and file 2nd ABLs fee app for BDC. (No Charge).	MP	0.40	\$0.00	\$0.00
11/01/2023	Receive BDC COS for Doc 280. File with court. (No Charge).	MP	0.10	\$0.00	\$0.00
11/01/2023	Research cases and revise letter to Dennis Bruce regarding continuing the adversary to extend the automatic stay.	JP	1.50	\$575.00	\$862.50
11/01/2023	Telephone call to Abram Carls regarding status of getting a bank to take over the excess DIP funds; discussion of progress on an alternative plan; moving forward on the dispute regarding the extent of the Bank's pre-petition security interest in the avoidance actions.	JP	0.20	\$575.00	\$115.00
11/02/2023	Review emails from Joe Benter and draft responsive emails in an attempt to get the July 5 billing so that I can finalize the 1st Accountant fee app.	MP	0.10	\$170.00	\$17.00
11/02/2023	Redact October Bank Statements for MOR inclusion.	MP	0.20	\$170.00	\$34.00
11/03/2023	Draft Notice of Dismissal for Adversary.	MP	0.10	\$170.00	\$17.00
11/03/2023	Receive further information from Joe Benter to supplement Accountant's 1st Fee App. Finalize preparation of fee app and Exhibit A. Send to Attorney Austin Peiffer for review.	MP	0.40	\$170.00	\$68.00

11/03/2023	Call with Attorney Joe Peiffer discussing reducing scope of requested relief in adversary proceeding seeking to extend the automatic stay to client's owner.	AP	0.20	\$350.00	\$70.00
11/03/2023	Telephone call from Ron Martin regarding adversary proceeding asking to extend the automatic stay and whether it is a winnable case.	JP	0.60	\$575.00	\$345.00
11/03/2023	Telephone call to Austin Peiffer regarding call from Ron Martin involving the adversary proceeding.	JP	0.10	\$575.00	\$57.50
11/03/2023	Telephone call to Dennis Bruce regarding providing funding for the Unsecured Creditor's Committee Counsel.	JP	0.10	\$575.00	\$57.50
11/03/2023	Telephone call to Liz Janczek regarding potential for a sale of BDC and resolution of other matters involved in moving the case forward.	JP	0.20	\$575.00	\$115.00
11/03/2023	Prepare for hearing on adversary complaint regarding TRO.	JP	0.50	\$575.00	\$287.50
11/03/2023	Participate in hearing on the adversary proceeding.	JP	0.50	\$575.00	\$287.50
11/03/2023	Telephone call to Dennis Bruce after hearing to discuss hearing on adversary proceeding and to discuss other issues in the case including payment of UCC fees.	JP	0.10	\$575.00	\$57.50
11/03/2023	Draft amendment to prayer of adversary complaint.	JP	0.50	\$575.00	\$287.50
11/03/2023	Draft e-mail to Liz Janczek regarding offer to increase payments to Unsecured Creditor's Committee Counsel.	JP	0.10	\$575.00	\$57.50
11/03/2023	Review Unsecured Creditor's Committee Counsel's rejection of offer of \$5,700/week plus the \$20,000 being held in the ABLs trust account and response with a counter-offer and forward to Dennis Bruce.	JP	0.10	\$575.00	\$57.50
11/03/2023	Finalize and file Amendment to Prayer Contained in Complaint (Doc. 1) in adversary no. 23-09042.	SD	0.10	\$170.00	\$17.00
11/06/2023	Meeting with Attorney Joe Peiffer discussing case status and how to proceed in case.	AP	0.10	\$350.00	\$35.00
11/06/2023	Draft the Proposed Order Granting Motion for Default Judgments for the Adversary Case and Attorney Austin Peiffer's approval.	AT	0.20	\$170.00	\$34.00
11/06/2023	Respond to e-mails from Todd Vandenberg regarding the second DIP account and motion.	JP	0.10	\$575.00	\$57.50
11/06/2023	Conference with Attorney Austin Peiffer to discuss next steps in case.	JP	0.10	\$575.00	\$57.50
11/06/2023	Review, edit, and approve proposed order granting motion for default judgment against KYF Global Partners and Kyle Enterprises, LLC.	AP	0.20	\$350.00	\$70.00
11/06/2023	Submit the Proposed Order Granting Motion for Default Judgments in the adversary case. (No Charge)	AT	0.20	\$0.00	\$0.00

11/06/2023	Begin reviewing accountant fee application.	AP	0.10	\$350.00	\$35.00
11/06/2023	Respond to client's CFO's emails discussing revising budget figures.	AP	0.20	\$350.00	\$70.00
11/07/2023	Prepare returned mail to be mailed out to the new address. (No Charge)	AT	0.30	\$0.00	\$0.00
11/07/2023	Update the Creditor Mailing Spreadsheet for the returned mail for the Schedule Amendments. (No Charge)	AT	0.70	\$170.00	\$119.00
11/07/2023	Finish reviewing first interim fee application for client's accountant.	AP	0.20	\$350.00	\$70.00
11/07/2023	Review App for Compensation for Accountant Bergan KDV and forward that, with exhibit and Nema's affidavit to Joe Benter for review before filing.	MP	0.20	\$170.00	\$34.00
11/07/2023	Finalize and file Accountant's 1st Fee App, Exhibit A, and Notice of same. Upload to CertificateofService.com for mailing. (No Charge).	MP	0.30	\$0.00	\$0.00
11/07/2023	Email to client's CFO discussing details of KSB's treatment under the plan and ideas for path going forward.	AP	0.30	\$350.00	\$105.00
11/07/2023	Update the creditor mailing spreadsheet from the returned mail that we received today and prep the returned mail to be mailed today to the creditor's updated address. (No Charge)	AT	0.20	\$0.00	\$0.00
11/07/2023	Review recent case on anti-cross-collateralization clauses and draft email to Attorney Joe Peiffer discussing its possible applicability in this case.	AP	0.70	\$350.00	\$245.00
11/07/2023	Email to client's principals discussing Five Star's request to file a late proof of claim.	AP	0.20	\$350.00	\$70.00
11/07/2023	Respond to email from Bank of America's counsel discussing plan treatment.	AP	0.20	\$350.00	\$70.00
11/07/2023	Teams meeting with Todd Shores and Dennis Bruce to discuss potential prospect for a sale of BDC.	JP	1.00	\$575.00	\$575.00
11/08/2023	Respond to Five Star Communications' counsel's email discussing claim amount discrepancy and potential missed payments.	AP	0.20	\$350.00	\$70.00
11/08/2023	Email to clerk of court inquiring whether we need to do anything to facilitate the separate entry of the default judgments in the adversary.	AP	0.20	\$350.00	\$70.00
11/08/2023	Forward Order Granting Motion to Open DIP Accounts to Dennis and Todd so that they can proceed with moving funds to comply with FDIC limits. (No Charge).	MP	0.10	\$0.00	\$0.00
11/08/2023	Draft stay violation letter to Herc Rentals. Send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
11/08/2023	Call with Attorney Joe Peiffer and Unsecured Creditors	AP	0.70	\$350.00	\$245.00

	Committee's counsel discussing plan status, funding professional fees, cash flow concerns, AP accruals, and upcoming hearings.				
11/08/2023	Call with Attorney Joe Peiffer discussing agenda for tomorrow's call with client's principal and Keystone Savings Bank.	AP	0.20	\$350.00	\$70.00
11/08/2023	Sketch agenda for tomorrow's call with client's principals and Keystone Savings Bank representatives.	AP	0.20	\$350.00	\$70.00
11/08/2023	Review Keystone Savings Bank's motion to recognize lien.	AP	0.10	\$350.00	\$35.00
11/08/2023	Respond to email from Caterpillar's attorney discussing plan treatment, client's intention to not pursue confirmation of the current plan, and removing Virginia collateral.	AP	0.20	\$350.00	\$70.00
11/08/2023	Review MidWestOne Bank's proposed account control agreement.	AP	0.20	\$350.00	\$70.00
11/08/2023	Telephone conference with Liz Janczk and Austin Peiffer to discuss prospects to move forward on DIP financing, bank security interest in Chapter 5 avoidance actions, plan feasibility.	JP	0.70	\$575.00	\$402.50
11/08/2023	Telephone call from Abram Carls regarding the status of the case; discussion of DIP; discussion of the potential plan amendments; discussion of Keystone Savings Bank collateral.	JP	0.40	\$575.00	\$230.00
11/08/2023	Draft e-mail to Dennis Bruce and Todd Shores regarding identification of potential buyers so the Unsecured Creditor's Committee can investigate the potential for sale of BDC.	JP	0.20	\$575.00	\$115.00
11/08/2023	Review DIP financing agreement regarding the default provisions surrounding how the Debtor is tied up by Keystone Savings Bank.	JP	0.10	\$575.00	\$57.50
11/08/2023	Review and approve letter to Herc Rentals regarding the violation of the automatic stay.	JP	0.10	\$575.00	\$57.50
11/08/2023	Draft e-mail to Elizabeth Janczak regarding Budget Variance Report.	JP	0.10	\$575.00	\$57.50
11/08/2023	Draft e-mail to Dennis Bruce regarding establishment of two DIP accounts at FDIC insured banks and the need to complete the revised Bank Account Reporting Form.	JP	0.30	\$575.00	\$172.50
11/09/2023	Review order denying extension of automatic stay.	AP	0.10	\$350.00	\$35.00
11/09/2023	Email copies of order denying extension of automatic stay to client's principal and others with comments.	AP	0.10	\$350.00	\$35.00
11/09/2023	Meeting with client's principal, Attorney Joe Peiffer, and Keystone Savings Bank representatives discussing plan amendments, DIP line of credit limits, possible outside funding sources for the plan, go-forward funding, and other	AP	1.30	\$350.00	\$455.00



issues.					
11/09/2023	Meeting with Travis Armstrong, Andy Johnson, Abram Carls, Austin Peiffer and Dennis Bruce to discuss how case is progressing; alterations to plan to move it forward; budget for plan; DIP financing as it relates to professional fees.	JP	1.40	\$575.00	\$805.00
11/09/2023	Create Spreadsheet for Austin comparing the POC from Caterpillar Financial with the Master Asset & Lease List.	AT	0.70	\$170.00	\$119.00
11/09/2023	Revise deposit account control agreement to incorporate party names and other customizations and circulate to relevant parties.	AP	0.40	\$350.00	\$140.00
11/09/2023	Respond to email from Unsecured Creditors Committee's counsel discussing prepetition accounts receivable deposit account and expectations for future collections of prepetition accounts receivable.	AP	0.10	\$350.00	\$35.00
11/09/2023	Respond to email from Marlin Leasing's counsel discussing answering adversary proceeding after court's ruling today.	AP	0.10	\$350.00	\$35.00
11/09/2023	Forward police report and insurance claim information to counsel for Keystone Savings Bank and GreenState Credit Union.	AP	0.10	\$350.00	\$35.00
11/09/2023	Send Austin the Signed Signature Page for MidwestOne Bank's Deposit Account Control Agreement. (No Charge)	AT	0.10	\$0.00	\$0.00
11/09/2023	Emails to client and Caterpillar's attorney discussing its removal of its Virginia collateral.	AP	0.10	\$350.00	\$35.00
11/09/2023	Take call from ECICOG's attorney discussing difficulties repossessing third truck in Virginia.	AP	0.20	\$350.00	\$70.00
11/10/2023	Meeting between Attorney Austin Peiffer and Chief Financial Strategist Keith Starr discussing options for addressing ECICOG's truck in Virginia that's on the side of the road without a key.	KS	0.30	\$290.00	\$87.00
11/10/2023	Meeting between Attorney Austin Peiffer and Chief Financial Strategist Keith Starr discussing options for addressing ECICOG's truck in Virginia that's on the side of the road without a key.	AP	0.30	\$350.00	\$105.00
11/10/2023	Email to ECICOG's attorney discussing options for repossessing truck without the key.	AP	0.40	\$350.00	\$140.00
11/10/2023	Draft letter to Virginia landlord warning about violating the automatic stay by removing the ECICOG pickup and demanding cooperation to mitigate damages from the violation.	AP	0.40	\$350.00	\$140.00
11/10/2023	Call with Hector Davila discussing disposition of Manassas yard collateral.	AP	0.20	\$350.00	\$70.00
11/10/2023	Email to ECICOG's attorney discussing conversation with	AP	0.10	\$350.00	\$35.00

Hector Davila regarding pickup in Virginia.					
11/10/2023	Finalize letter to Soft Dig regarding stay violations by having vehicles removed and using the forklift.	AP	0.50	\$350.00	\$175.00
11/10/2023	Email to Manchester Leasing Service's counsel discussing Manassas, VA equipment situation and the imperative that his client remove its property and collateral.	AP	0.30	\$350.00	\$105.00
11/10/2023	Prepare the Letter to Soft Dig Properties to be mailed via USPS.	AT	0.80	\$170.00	\$136.00
11/10/2023	Refresh recollection of Ally Bank's stay relief motion and client's collateral valuation.	AP	0.10	\$350.00	\$35.00
11/10/2023	Call with Ally Bank's counsel discussing consenting to adequate protection and trying to establish payment amounts.	AP	0.10	\$350.00	\$35.00
11/10/2023	Email to client verifying that it still needs Ally Bank's trucks and inquiring what adequate protection payments it wants to offer.	AP	0.20	\$350.00	\$70.00
11/10/2023	Draft answer to Ally Bank's stay relief motion.	AP	0.30	\$350.00	\$105.00
11/10/2023	Email ECICOG and Manchester Leasing Services respective counsels and the client a copy of the letter from ABLs to Soft Dig Properties, LLC. (No Charge)	AT	0.20	\$0.00	\$0.00
11/10/2023	Respond to email from Manchester Leasing Service's counsel with all the information we have about the location of its property and collateral in and around the Manassas lot.	AP	0.50	\$350.00	\$175.00
11/10/2023	Finalize and file Debtor's Answer to Ally Bank's Motion for Relief from Stay or in the Alternative for Adequate Protection.	SD	0.10	\$170.00	\$17.00
11/10/2023	Review Lease between Soft Dig Properties, LLC and BDC Group Inc. dated October 1, 2022, regarding procedure for sending written notice.	SD	0.10	\$170.00	\$17.00
11/10/2023	Email to Caterpillar's attorney discussing client's intention to retain remaining leased equipment.	AP	0.10	\$350.00	\$35.00
11/13/2023	Email Counsel for Keystone Savings Bank a copy of the client's Reorganization Plan per Attorney Austin Peiffer's request.	AT	0.10	\$170.00	\$17.00
11/13/2023	Take call from Hector Davila discussing status of property removed from Manassas lot.	AP	0.10	\$350.00	\$35.00
11/13/2023	Emails to counsel for Manchester Leasing Service and ECICOG discussing recovering equipment in Virginia.	AP	0.30	\$350.00	\$105.00
11/13/2023	Call with Zayo's counsel discussing its sense of the relationship between it and client and its thoughts on continuing that relationship.	AP	0.20	\$350.00	\$70.00

11/13/2023	Email to client's principals discussing call with Zayo's counsel and its possible implications for client's go-forward plan.	AP	0.10	\$350.00	\$35.00
11/13/2023	Respond to email from UHC discussing client's intentions with respect to employee benefits policy.	AP	0.10	\$350.00	\$35.00
11/13/2023	Respond to client's email discussing options for dealing with Caterpillar's leases.	AP	0.20	\$350.00	\$70.00
11/13/2023	Conference with Steve Ginther and Austin Peiffer to discuss situation with disclosure of prospective purchasers and curing of lease defaults.	JP	0.90	\$575.00	\$517.50
11/13/2023	Draft e-mail to client regarding curing of lease defaults.	JP	0.30	\$575.00	\$172.50
11/14/2023	Emails to client and Iowa Attorney General's office discussing garnishment.	AP	0.10	\$350.00	\$35.00
11/14/2023	Research new addresses for the returned mail from creditor Marlin Business Bank regarding the schedule amendments that were previously mailed out.	AT	0.20	\$170.00	\$34.00
11/14/2023	Prepare the Returned mail to be sent out to the new address for creditor WM Corporate Services Inc. (No Charge)	AT	0.20	\$0.00	\$0.00
11/14/2023	Meeting with Attorney Joe Peiffer researching and discussing disclosing prospective buyers' identities to Unsecured Creditors Committee.	AP	0.70	\$350.00	\$245.00
11/14/2023	Call with counsel for the Unsecured Creditors Committee discussing hearing scheduling and a response to her proposal next week.	AP	0.10	\$350.00	\$35.00
11/14/2023	Telephone call to Professor Nancy Rapaport regarding a DIP's duty to disclose potential purchasers.	JP	0.20	\$575.00	\$115.00
11/14/2023	Draft e-mail to Todd Shores and Dennis Bruce regarding the leases that must be cured to confirm the Plan and provide summary document from amended Schedule G.	JP	0.50	\$575.00	\$287.50
11/15/2023	Forward new bank account reporting form to United States Trustee's office.	AP	0.10	\$350.00	\$35.00
11/15/2023	Research duties of the debtor in possession regarding disclosure of information.	JP	0.20	\$575.00	\$115.00
11/15/2023	Draft e-mails to Todd Vandenberg, client and Bank regarding establishment of new DIP Account at MidWestOne Bank.	JP	0.20	\$575.00	\$115.00
11/15/2023	Forward MidWestOne Bank's wiring instructions to client.	AP	0.10	\$350.00	\$35.00
11/15/2023	Update the Lease Summary with Payments document for Attorney Joseph Peiffer.	AT	1.30	\$170.00	\$221.00
11/15/2023	Email the updated Lease Summary with Payments document to Attorney Joseph Peiffer and Attorney Austin	AT	0.10	\$0.00	\$0.00

	Peiffer. (No Charge)				
11/15/2023	Conference with Alex Tvedte regarding assembling summary of unpaid true leases.	JP	0.30	\$575.00	\$172.50
11/16/2023	Weekly case status update meeting with client's principal, Attorney Joe Peiffer, and Keystone Savings Bank representatives.	AP	0.50	\$350.00	\$175.00
11/16/2023	Email to Zayo's counsel discussing terminating contract.	AP	0.40	\$350.00	\$140.00
11/16/2023	Email to client's principals discussing Ally Bank adequate protection.	AP	0.20	\$350.00	\$70.00
11/16/2023	Meet with Attorney Austin Peiffer to discuss whether there is a benefit to liquidating collateral for Ally debt or for ECICOG debt.	YH	0.20	\$405.00	\$81.00
11/16/2023	Model out whether there would be any advantage to client, in reducing its truck fleet, to surrendering oversecured versus undersecured vehicles.	AP	0.10	\$350.00	\$35.00
11/16/2023	Meet with Attorney Yara Halloush to discuss whether there is a benefit to liquidating collateral for Ally debt or for ECICOG debt.	AP	0.20	\$350.00	\$70.00
11/16/2023	Draft Notice of Conference Call Instructions for November 17, 2023 Hearing.	LJ	0.20	\$170.00	\$34.00
11/16/2023	Email drafted Notice of Conference Call Instructions for November 17, 2023 Hearing to Attorney Austin Peiffer for review. (No Charge).	LJ	0.10	\$0.00	\$0.00
11/17/2023	Respond to email from Manchester Leasing Service and its counsel discussing locating equipment in Virginia.	AP	0.20	\$350.00	\$70.00
11/17/2023	Call between Attorney Austin Peiffer and Chief Financial Strategist Keith Starr discussing resolving Manchester Leasing Services cure payment discrepancies.	AP	0.10	\$350.00	\$35.00
11/17/2023	Download and save the October Bank Statements to ND. (No Charge)	AT	0.20	\$0.00	\$0.00
11/17/2023	Compile all of the information that is going to Keith regarding the Manchester Leasing Services payment computation issue. (No Charge)	AT	0.50	\$0.00	\$0.00
11/17/2023	Draft and circulate proposed order granting Ally Bank's stay relief motion.	AP	0.30	\$350.00	\$105.00
11/17/2023	Edit & recirculate proposed order granting Ally Bank's stay relief motion.	AP	0.20	\$350.00	\$70.00
11/17/2023	Begin compiling October MOR attachments.	LJ	0.30	\$170.00	\$51.00
11/17/2023	Email Todd Shores to request remaining documents needed for the October MOR.	LJ	0.10	\$170.00	\$17.00

11/17/2023	Call in to conference call for hearing on Ally's stay relief motion and inform parties who called in that the matter had been settled.	AP	0.10	\$350.00	\$35.00
11/21/2023	Respond to client's email discussing addressing missing ECICOG truck in Virginia.	AP	0.10	\$350.00	\$35.00
11/21/2023	Respond to email discussing filing police report for missing ECICOG truck in Virginia.	AP	0.10	\$350.00	\$35.00
11/21/2023	Emails to creditors with collateral in the Manassas, VA yard discussing the location of that collateral and urging them to have it picked up.	AP	0.60	\$350.00	\$210.00
11/21/2023	Email Todd Shores to follow up on documents needed for the October MOR.	LJ	0.10	\$170.00	\$17.00
11/22/2023	Email Todd Shores to follow up on October MOR documents.	LJ	0.10	\$170.00	\$17.00
11/22/2023	Download, OCR, and upload October MOR documents received from Todd Shores to NetDocuments. (No Charge).	LJ	0.30	\$0.00	\$0.00
11/22/2023	Redact and prepare attachments to October MOR.	LJ	0.50	\$170.00	\$85.00
11/22/2023	Review pictures of the Aldie, VA lot, review what equipment had been stored there, and draft email to client's principals discussing what property remains there and plan to reject lease and abandon any remaining property.	AP	0.30	\$350.00	\$105.00
11/22/2023	Edited and saved the Aldie, VA photos from Austin into ND. (No Charge)	AT	0.20	\$0.00	\$0.00
11/22/2023	Email October MOR and its attachments to Attorney Austin Peiffer for review. (No Charge).	LJ	0.10	\$0.00	\$0.00
11/22/2023	Review and approve October monthly report.	AP	0.20	\$350.00	\$70.00
11/22/2023	Prepare October MOR for Dennis Bruce's e-signature, and send to him via Dropbox Sign. (No Charge).	LJ	0.20	\$0.00	\$0.00
11/22/2023	Draft e-mail to Dennis regarding dismissal of the adversary to extend the stay.	JP	0.10	\$575.00	\$57.50
11/22/2023	Draft e-mail to Dennis regarding to whom Great America Leasing should contact to pick up the equipment.	JP	0.10	\$575.00	\$57.50
11/27/2023	Download and save signed October MOR to NetDocuments. (No Charge).	LJ	0.10	\$0.00	\$0.00
11/27/2023	Locate the information for Mark Swan to email him and get a good address for sending information to the creditor he previously represented. (No Charge)	AT	0.10	\$0.00	\$0.00
11/27/2023	Email Mark Swan to get an updated address for creditor Marlin Business Bank.	AT	0.10	\$170.00	\$17.00
11/27/2023	Draft framework for response to UST's Objection to ABL's	MP	0.30	\$170.00	\$51.00

	2nd Fee App. Send to Attorney Austin Peiffer for review and completion.				
11/27/2023	Prepare the Amended Schedules returned mail to be sent out to the updated address for the Creditor Marlin Business Bank. (No Charge)	AT	0.20	\$0.00	\$0.00
11/27/2023	Email Mark Swan a copy of the Notice of Schedule Amendments and the Schedule Amendments that were going to creditor Marlin Business Corporation.	AT	0.10	\$170.00	\$17.00
11/27/2023	Respond to Sheets Sterling's counsel's inquire about Dennis Bruce's personal counsel.	AP	0.10	\$350.00	\$35.00
11/27/2023	Review and pass along email from the Arizona Department of Revenue regarding unfiled returns.	AP	0.10	\$350.00	\$35.00
11/27/2023	Research whether recent opinion on attorney fee applications has been published on Westlaw and try to find contact information for Westlaw representative to expedite that process.	AP	0.20	\$350.00	\$70.00
11/28/2023	Review and respond to Attorney Austin Peiffer email regarding questions on Bergan KDV's 1st fee app. (No Charge).	MP	0.20	\$0.00	\$0.00
11/28/2023	Respond to United States Trustee's inquiry about accountant's fee application.	AP	0.20	\$350.00	\$70.00
11/28/2023	Telephone call to Dennis Bruce to discuss timing for outside investors to come forward for inclusion in the Plan and Disclosure Statement; discussion regarding amount of cash needed to cure defaults in true leases.	JP	0.30	\$575.00	\$172.50
11/29/2023	Respond to client's CFO's inquiry discussing computing loan payments under the plan.	AP	1.00	\$350.00	\$350.00
11/29/2023	Draft e-mail to Todd regarding amount that the Debtor is requesting from Keystone Savings Bank to pay to ABLs and draft e-mail to Austin Peiffer to assist Debtor in determining the potential shortfall that could be caused given need to cure defaults on leases.	JP	0.10	\$575.00	\$57.50
11/29/2023	Respond to email from MLS discussing recovering AT40 trailer and reel trailer from Virginia.	AP	0.10	\$350.00	\$35.00
11/29/2023	Email to GreenState's counsel discussing removing the Toyota forklift from the Manassas, VA lot.	AP	0.20	\$350.00	\$70.00
11/29/2023	Email to client's principals discussing GreenState's forklift in Manassas, VA and whether the Aldie, VA lot now looks clear.	AP	0.10	\$350.00	\$35.00
11/30/2023	Meeting with Dennis Bruce, Austin Peiffer, Abram Carls, Andy Johnson and Todd Shores regarding status of case; questions regarding Zayo; discussion of outside investors.	JP	0.30	\$575.00	\$172.50
11/30/2023	Weekly case status update meeting with client's principals,	AP	0.20	\$350.00	\$70.00

Attorney Joe Peiffer, and KSB representatives.					
11/30/2023	Respond to Ditch Witch of Virginia's counsel's email discussing why nondischargeability does not apply to Chapter 11 business debtors.	AP	0.20	\$350.00	\$70.00
11/30/2023	Locate the most recent Master Service List and send it to Attorney Austin Peiffer to see if it needs to be updated. (No Charge)	AT	0.10	\$0.00	\$0.00
11/30/2023	Respond to Ditch Witch of Virginia's attorney's email discussing why his client's claim would be discharged upon plan confirmation.	AP	0.20	\$350.00	\$70.00
11/30/2023	Respond to email from client's CFO discussing that it's unnecessary to make cure payments for leases that are being rejected.	AP	0.10	\$350.00	\$35.00
12/01/2023	Draft the Motion to Reject Lease regarding the Aldie, VA lot.	AT	0.50	\$170.00	\$85.00
12/01/2023	Review Manchester Leasing payment issue.	MP	0.80	\$170.00	\$136.00
12/01/2023	Review analysis of discrepancy between Manchester Leasing Services' claimed cure payment amount and the amount BDC paid.	AP	0.10	\$350.00	\$35.00
12/01/2023	Review & respond to email from Bank of America's attorney discussing options for consensual plan treatment.	AP	0.10	\$350.00	\$35.00
12/01/2023	Email to client's principals discussing Bank of America's proposals for consensual plan treatment.	AP	0.10	\$350.00	\$35.00
12/01/2023	Review and rework motion to reject Aldie, VA lease.	AP	0.30	\$350.00	\$105.00
12/01/2023	Email Abe Carls a version of the drafted Motion to Reject Lease for Aldie, VA and see if Keystone has any issues with this motion.	AT	0.20	\$170.00	\$34.00
12/01/2023	Forward Kirkwood Community College's email to client's principals and Attorney Joe Peiffer with comments and questions.	AP	0.20	\$350.00	\$70.00
12/01/2023	Initial reply to Kirkwood Community College's attorney's email identifying three issues with its request for payment of its debts.	AP	0.20	\$350.00	\$70.00
12/04/2023	Draft the Motion to Reject Lease relating to the Soft Dig Properties, LLC Manassas, VA lot.	AT	0.20	\$170.00	\$34.00
12/04/2023	Review Kirkwood Industrial New Jobs Tax Credit agreements and applicable laws then draft email recommendation to client.	AP	0.80	\$350.00	\$280.00
12/04/2023	Take call from Unsecured Creditors Committee's counsel discussing updated budget, revising plan, paying administrative expense claims, information on investors, other activities the Committee could be undertaking, and	AP	0.50	\$350.00	\$175.00

	options for addressing Kirkwood debt.				
12/04/2023	Email to client's CFO requesting status update on revised budget and Arizona tax returns.	AP	0.10	\$350.00	\$35.00
12/04/2023	Update the Returned Mail Spreadsheet with the new returned mail information. (No Charge)	AT	0.10	\$0.00	\$0.00
12/05/2023	Email to client's principals and Attorney Joe Peiffer reviewing conversation with Unsecured Creditors Committee's attorney.	AP	0.30	\$350.00	\$105.00
12/05/2023	Download all of the documents that Todd shared with Austin. Sent them to Leah. (No Charge)	AT	0.10	\$0.00	\$0.00
12/05/2023	Download, OCR, and upload MOR documents received from Todd Shores to NetDocuments. (No Charge).	LJ	0.10	\$0.00	\$0.00
12/05/2023	Prepare November MOR attachments.	LJ	0.30	\$170.00	\$51.00
12/05/2023	Email Todd Shores to request the November AP and the reconciliation statement for account #2633.	LJ	0.10	\$170.00	\$17.00
12/05/2023	Phone and email follow-ups to call from Ally apparently regarding past-due invoices.	AP	0.20	\$350.00	\$70.00
12/06/2023	Upload additional MOR documents received from Todd Shores to NetDocuments. (No Charge).	LJ	0.20	\$0.00	\$0.00
12/06/2023	Finish assembling and redact account numbers from MOR attachments.	LJ	0.40	\$170.00	\$68.00
12/06/2023	Email to client's principal discussing motions to reject leases, dismissing the adversary proceeding, and disclosing information about potential investors.	AP	0.40	\$350.00	\$140.00
12/06/2023	Email BDC Group Inc.'s November MOR and its attachments to Attorney Austin Peiffer for review. (No Charge).	LJ	0.10	\$0.00	\$0.00
12/06/2023	Update the Motion to Reject Unexpired Lease for the Manassas Lot.	AT	0.10	\$170.00	\$17.00
12/06/2023	Update the Motion to Reject Unexpired Lease for the Aldie lot.	AT	0.10	\$170.00	\$17.00
12/06/2023	Prepare the returned Schedule Amendment mail to be mailed to the updated address for creditor Complete Design Solutions LLC. (No Charge)	AT	0.30	\$0.00	\$0.00
12/06/2023	Draft the Combined Bar Date Notice to the Motions to Reject the Leases.	AT	0.20	\$170.00	\$34.00
12/06/2023	Email Attorney Austin Peiffer the draft of the Combined Bar Date Notice for the Motions to Reject the Leases. (No Charge)	AT	0.10	\$0.00	\$0.00
12/07/2023	Meet with bankers, Abram Carls, Dennis Bruce, Todd	JP	0.70	\$575.00	\$402.50



	Shores and Austin Peiffer to discuss status of case and progress on revised plan.				
12/07/2023	Weekly status update meeting with client's principals, Attorney Joe Peiffer, and Keystone Savings Bank representatives.	AP	0.70	\$350.00	\$245.00
12/07/2023	Finalize the Motion to Reject Leases for both the Aldie and Manassas Lots.	AT	0.20	\$170.00	\$34.00
12/07/2023	File the Motions to Reject Leases for both the Aldie and Manassas Lots. (No Charge)	AT	0.20	\$0.00	\$0.00
12/07/2023	Prepare Motions to Reject Unexpired Leases (Docs. 308 & 309) to be mailed as described in their Certificates of Service. (No Charge).	LJ	0.20	\$0.00	\$0.00
12/07/2023	Finalize the Combined Notice of Motions to Reject Leases.	AT	0.20	\$170.00	\$34.00
12/07/2023	File the Combined Bar Date Notice for the Motions to Reject Leases. (No Charge)	AT	0.10	\$0.00	\$0.00
12/07/2023	Prepare Combined Notice of Motions to Reject Leases (Doc. 310) to be mailed to the Master Service List, Soft Dig Properties, LLC, and Youngwood Lane LLC. (No Charge).	LJ	0.40	\$0.00	\$0.00
12/07/2023	Prepare all of the mailings for the Motions to Reject Leases for both the Manassas and Aldie lots as well as the combined Bar date Notice for the Motions. (No Charge)	AT	0.20	\$0.00	\$0.00
12/08/2023	Email to United States Trustee's trial attorney discussing allowing undisputed attorney fees and deferring the objection and disputed fees until later.	AP	0.20	\$350.00	\$70.00
12/08/2023	Email opposing counsel seeking consent to a stipulation of dismissal for the adversary.	AP	0.10	\$350.00	\$35.00
12/08/2023	Send email to Dennis and Todd about the Notice for the Telephonic Hearing on the Motion for Relief from Stay as well as notify them of the deadline for our objection. (No Charge)	AT	0.10	\$0.00	\$0.00
12/08/2023	Draft Stipulated Dismissal for BDC adversary. Send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
12/08/2023	Draft Proposed Order Partially Granting ABL's 2nd Fee App and send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
12/08/2023	Review, edit, and approve proposed FRCP 41(a)(1)(A)(ii) stipulation of dismissal for adversary proceeding and proposed consent order on Ag & Business Legal Strategies' second fee application.	AP	0.20	\$350.00	\$70.00
12/08/2023	Circulate Proposed Consent Order re ABL's 2nd Fee Application and Stipulated Dismissal of BDC adversary proceeding.	MP	0.10	\$170.00	\$17.00
12/11/2023	Review Zayo's motion to expedite hearing on its stay relief	AP	0.10	\$350.00	\$35.00

	motion and the accompanying affidavit.				
12/11/2023	Email to client's principal notifying him of Zayo's motion to expedite hearing and asking for his response to the factual allegations.	AP	0.20	\$350.00	\$70.00
12/11/2023	Call with Unsecured Creditors Committee's counsel discussing Zayo's stay relief motion, revised budget status, and case status generally.	AP	0.40	\$350.00	\$140.00
12/11/2023	Review United States Trustee's edits to the proposed consent order on the objections to Ag & Business Legal Strategies' second fee application, edit the proposed order, and email United States Trustee's counsel about minor revisions made.	AP	0.40	\$350.00	\$140.00
12/11/2023	Meeting with Austin Peiffer to discuss Zayo's Motion to Expedite Hearing on Motion to Lift Stay to discontinue use of BDC to handle projects.	JP	0.20	\$575.00	\$115.00
12/12/2023	Finalize and file Stipulated Dismissal of Complaint for adversary. (No Charge).	MP	0.10	\$0.00	\$0.00
12/12/2023	Email Attorney Austin Peiffer to follow up on November MOR. (No Charge).	LJ	0.10	\$0.00	\$0.00
12/12/2023	Return telephone call to Ally Bank and place telephone call to Stephanie Hinz regarding call to Ally Bank. Give Stephanie Dennis' contact info to arrange for return of the Ally-financed pickups.	MP	0.30	\$170.00	\$51.00
12/12/2023	Review November monthly report and compare to previous months' reports.	AP	0.40	\$350.00	\$140.00
12/13/2023	Review client's filed and unfiled monthly reports, draft table tracking changes in reported values over time, and email to Attorney Joe Peiffer with analysis.	AP	1.00	\$350.00	\$350.00
12/13/2023	Prepare the returned mail for creditor JJJ Cable Communication to be sent out to the updated address. (No Charge)	AT	0.20	\$0.00	\$0.00
12/13/2023	Return telephone call to Ally servicer AIS Portfolio Solutions, LLC, regarding steps to return two 2022 GMC Canyon trucks.	MP	0.30	\$170.00	\$51.00
12/13/2023	Called Creditor Coastal Communications to confirm their address to send the returned mailed Schedule Amendments. No answer. (No Charge)	AT	0.10	\$0.00	\$0.00
12/13/2023	Send monthly report analysis to clients with commentary.	AP	0.20	\$350.00	\$70.00
12/13/2023	Prepare the returned mail for creditor Coastal Communications to be mailed out to their updated address. (No Charge)	AT	0.10	\$0.00	\$0.00
12/13/2023	Review Zayo's stay relief motion, the contract and related documents, its motion to expedite hearing and the	AP	1.70	\$350.00	\$595.00

	corresponding affidavit, and client's email discussing the Zayo motion, and draft resistance to Zayo's stay relief motion.				
12/14/2023	Finalize the Resistance to Motion for Relief from Automatic Stay to Terminate Executory Contract.	AT	0.10	\$170.00	\$17.00
12/14/2023	File the Resistance to Motion for Relief from Automatic Stay to Terminate Executory Contract. (No Charge)	AT	0.20	\$0.00	\$0.00
12/14/2023	Call the Clerk of Court's Office to get guidance on what to file the Resistance to Motion for Relief from Automatic Stay and Executory Contract. (No Charge)	AT	0.10	\$0.00	\$0.00
12/14/2023	Call with Bank of the West's counsel discussing its claim, cure amount, plan treatment, and new plan.	AP	0.10	\$350.00	\$35.00
12/15/2023	Draft responsive message to Attorney Austin Peiffer regarding which charges were excluded as prepetition on the Bergan KDV fee app. (No Charge).	MP	0.10	\$0.00	\$0.00
12/15/2023	Participate in hearing on Zayo's stay relief motion, Keystone Savings Bank's lien recognition motion, and first interim accountant fee application.	AP	0.60	\$350.00	\$210.00
12/15/2023	Email to client's CFO requesting the latest budget variance report and inquiring about the revised budget.	AP	0.10	\$350.00	\$35.00
12/18/2023	Review First Interim Application for Compensation for Debtor's Accountant, its attached invoices, and supporting documentation received from the accountant in NetDocuments to create spreadsheet outlining the charges for each individual time entry on each invoice and the time entries that were excluded from the Application.	LJ	1.50	\$170.00	\$255.00
12/18/2023	Call with Zayo's local counsel discussing potential larger mechanic's liens, outstanding debts to subcontractors and from Zayo, and potential settlement proposal.	AP	0.30	\$350.00	\$105.00
12/18/2023	Email to client's principals inquiring about debts to Zayo subcontractors and outstanding debts Zayo has not paid.	AP	0.30	\$350.00	\$105.00
12/19/2023	Return call to AIS Portfolio Solutions regarding Ally-financed trucks and voluntary surrender form. (Half rate).	MP	0.50	\$85.00	\$42.50
12/19/2023	Update spreadsheet for the Response to Objection to First Interim Application for Compensation for Debtor's Accountant to exclude all time entries outside the application date range.	LJ	0.20	\$170.00	\$34.00
12/19/2023	Email Joe Benter with Bergan KDV to request document outlining the individual time entries on invoice #1210497.	LJ	0.20	\$170.00	\$34.00
12/19/2023	Draft and distribute NDA for the Unsecured Creditors Committee regarding the identities of potential investors.	AP	0.60	\$350.00	\$210.00
12/20/2023	Email to client's principals requesting exhibit & witness information for Zayo hearing, updated budget and budget	AP	0.20	\$350.00	\$70.00

	variance report, and responses to prior inquiries about the monthly report analysis.				
12/20/2023	Update spreadsheet for the Response to Objection to First Interim Application for Compensation for Debtor's Accountant to include additional information provided by Joe Benter.	LJ	0.10	\$170.00	\$17.00
12/20/2023	Draft Letter to Claire Davison regarding the UST's objection to the First Interim Application for Compensation for Debtor's Accountant.	LJ	0.20	\$170.00	\$34.00
12/20/2023	Send November MOR to Dennis Bruce via Dropbox Sign for his e-signature. (No Charge).	LJ	0.10	\$0.00	\$0.00
12/21/2023	Respond to client's email discussing possible resolutions to the Zayo matter.	AP	0.10	\$350.00	\$35.00
12/21/2023	Further telephone call to AIS Portfolio Solutions regarding Voluntary Surrender form for 2022 GMC Canyons. They allege that we should receive the form today (No Charge).	MP	0.20	\$0.00	\$0.00
12/21/2023	Telephone call to Jeff Goetz, counsel for Zayo, and draft follow-up e-mail to Austin Peiffer and Dennis Bruce regarding the comments and questions of Jeff Goetz.	JP	0.50	\$575.00	\$287.50
12/21/2023	Telephone call from Abram Carls regarding status of case and reason for cancelation of status meeting.	JP	0.20	\$575.00	\$115.00
12/21/2023	Upload signed November MOR to NetDocuments and prepare it and its attachments for filing. (No Charge).	LJ	0.20	\$0.00	\$0.00
12/21/2023	Telephone call to Dennis Bruce about missed meeting and prospects to have investors purchase part or all of the company.	JP	0.10	\$575.00	\$57.50
12/21/2023	Telephone call to Abram Carls after call to Dennis Bruce inquiring about meeting with Bank in person on 12/22/23 and wondering whether the case should progress to a formal sale process; discussion of Zayo contract concerns; discussion regarding lack of budget and DIP financing.	JP	0.40	\$575.00	\$230.00
12/21/2023	Take call from the unsecured creditors committee's counsel discussing tomorrow's hearing, budget status, and the Zayo matter.	AP	0.30	\$350.00	\$105.00
12/21/2023	Review, edit, and send letter to United States Trustee responding to objection to the accountant's fee application.	AP	0.50	\$350.00	\$175.00
12/21/2023	Email Joe Benter with BerganKDV to advise we will be filing a second fee application to cover time entries that fell outside the date range of the first fee application and inquire if they have done any additional work for BDC Group Inc. since the last invoice.	LJ	0.20	\$170.00	\$34.00
12/22/2023	Meeting between Attorney Joe Peiffer, Attorney Austin Peiffer, client's principal, and Keystone Savings Bank representatives discussing case status, Zayo hearing, sale	AP	1.70	\$350.00	\$595.00

	process, and options going forward.				
12/22/2023	Meeting between Attorney Joe Peiffer, Attorney Austin Peiffer, client's principal, and Keystone Savings Bank representatives discussing case status, Zayo hearing, sale process, and options going forward.	JP	1.70	\$575.00	\$977.50
12/22/2023	Review Zayo contract and draft email to client's principal outlining documents needed to prepare for hearing on Zayo's stay relief motion.	AP	0.20	\$350.00	\$70.00
12/22/2023	Review Zayo contract and draft email to Attorney Joe Peiffer and Keystone Savings Bank's counsel discussing language in the Zayo contract related to railroad delays and liquidated damages.	AP	0.20	\$350.00	\$70.00
12/22/2023	Telephone call from Jeff Goetz demanding that BDC consent to termination of the contract with any amounts due under the contract to be litigated or settled in bankruptcy court.	JP	0.20	\$575.00	\$115.00
12/22/2023	Participate in continued hearing on accountant's first fee application.	AP	0.10	\$350.00	\$35.00
12/22/2023	Draft & circulate proposed order resolving the United States Trustee's objection to the first accountant fee application.	AP	0.30	\$350.00	\$105.00
12/22/2023	Email to Keystone Savings Bank's counsel discussing interactions with potential investors/buyers.	AP	0.10	\$350.00	\$35.00
12/22/2023	Call to Dennis Bruce regarding Zayo unpaid invoices.	JP	0.10	\$575.00	\$57.50
12/22/2023	Conference with Austin Peiffer to review Jeff Goetz's Settlement Proposal on behalf of Zayo.	JP	0.20	\$575.00	\$115.00
12/22/2023	Conference with Dennis Bruce before meeting with Keystone Savings Bank.	JP	0.50	\$575.00	\$287.50
12/22/2023	Conference with Joe Peiffer to review Jeff Goetz's proposed Zayo settlement.	AP	0.20	\$350.00	\$70.00
12/22/2023	Conference with Ausitn Peiffer to review Jeff Goetz's proposed Zayo settlement.	JP	0.20	\$600.00	\$120.00
12/23/2023	Draft lengthy e-mail to Zayo counsel, Jeff Goetz, regarding problems with contract, amounts owed, discussion of other work that BDC can do on project.	JP	0.50	\$575.00	\$287.50
12/23/2023	Telephone call to Dennis Bruce regarding amounts of invoices that Zayo had agreed to pay.	JP	0.10	\$575.00	\$57.50
12/26/2023	Email Dennis regarding an inquiry that we received from Coastal Communications and their association with BDC. (No Charge)	AT	0.10	\$0.00	\$0.00
12/26/2023	Review business valuation methods and Attorney Joe Peiffer's summary of this morning's meeting with Thermobond.	AP	0.20	\$350.00	\$70.00

12/26/2023	Draft Second Interim Application for Compensation for Debtor's Accountant and prepare its Exhibit A.	LJ	0.60	\$170.00	\$102.00
12/26/2023	Meeting with Diversity Capital Group, Dennis Bruce, Abe Carls, Andy Johnson and Travis Armstrong to gauge Diversity's interest in purchasing company.	JP	0.50	\$575.00	\$287.50
12/26/2023	Participate in meeting with Thermobond regarding its interest in purchasing BDC.	JP	1.20	\$575.00	\$690.00
12/26/2023	Draft NDA for prospective investors and send to client's principal.	AP	0.60	\$350.00	\$210.00
12/27/2023	Download and save the two Zayo emails with photos for Attorney Austin Peiffer and Attorney Joseph Peiffer. (No Charge)	AT	0.30	\$0.00	\$0.00
12/27/2023	Review email from GreenState Credit Union's attorney regarding Status of Insurance Claim as well as locations of other units and draft an email to client for Attorney Austin Peiffer.	AT	0.60	\$170.00	\$102.00
12/27/2023	Call Liberty Mutual to get a status update regarding the claim for the stolen Virginia Property.	AT	0.20	\$170.00	\$34.00
12/27/2023	Download and save all of the Zayo Change Orders Documents from Dropbox to ND.	AT	0.40	\$170.00	\$68.00
12/27/2023	Draft Email to Client regarding GreenState Credit Union and MLS Equipment and the Liberty Mutual Insurance Claim.	AT	0.30	\$170.00	\$51.00
12/27/2023	Email Client's Accountant a copy of the 2023-12-27 Consent Order Granting the First Interim Application for Compensation for Debtor's Accountant. (No Charge)	AT	0.10	\$0.00	\$0.00
12/27/2023	Email Client a copy of the 2023-12-27 Consent Order Granting the First Interim Application for Compensation for Debtor's Accountant. (No Charge)	AT	0.10	\$0.00	\$0.00
12/27/2023	Send Email to Client regarding the Status update for the Liberty Mutual Claim, as well as the status of other leased equipment. (No Charge)	AT	0.10	\$0.00	\$0.00
12/27/2023	Forward lawsuit against client's principal to his personal counsel and advise plaintiff's attorney of Ag & Business Legal Strategies' limited representation.	AP	0.10	\$350.00	\$35.00
12/28/2023	Meeting with client's principal discussing status of Zayo matter.	AP	0.10	\$350.00	\$35.00
12/28/2023	Take call from Unsecured Creditors Committee's counsel discussing upcoming hearing on Zayo's stay relief motion, pending information and document requests, and counsel's second fee application.	AP	0.60	\$350.00	\$210.00
12/28/2023	Review files client supplied related to Zayo dispute.	AP	0.30	\$350.00	\$105.00

12/28/2023	Email to client's principals discussing information requests.	AP	0.20	\$350.00	\$70.00
12/28/2023	Follow-up email to Keystone Savings Bank's counsel discussing possible NDA and conversation with the Unsecured Creditors Committee's counsel.	AP	0.10	\$350.00	\$35.00
12/29/2023	Receive, review, complete, and return voluntary surrender forms for two 2022 GMC Canyon trucks financed by Ally Financial.	MP	0.20	\$170.00	\$34.00
12/29/2023	Draft the Proposed Order Granting Motions to Reject Unexpired Leases (Docs. 308 and 309) for Attorney Austin Peiffer's approval.	AT	0.20	\$170.00	\$34.00
12/29/2023	Search for all of the correspondence for the property removal from the Manassas lot.	AT	0.40	\$170.00	\$68.00
12/29/2023	Respond to email from GreenState Credit Union's attorney discussing insurance claims, truck, and remaining forklift.	AP	0.10	\$350.00	\$35.00
12/29/2023	Teams call with Attorney Austin Peiffer discussing finding correspondence for the return of the lienholders property as well as other contact information.	AT	0.20	\$170.00	\$34.00
12/29/2023	Review, edit, and approve proposed order granting motions to reject leases on Virginia properties.	AP	0.10	\$350.00	\$35.00
12/29/2023	Teams call with Attorney Austin Peiffer discussing finding correspondence for the return of the lienholders property as well as other contact information.	AP	0.20	\$350.00	\$70.00
12/29/2023	Finalize the Proposed Order Granting Combined Motions to Reject Unexpired Leases.	AT	0.10	\$170.00	\$17.00
12/29/2023	Submit the Proposed Order Granting Combined Motions to Reject Unexpired Leases to the Court. (No Charge)	AT	0.10	\$0.00	\$0.00
12/29/2023	Send follow up email to Dennis regarding the information that he requested we gather for the Liberty Mutual Claim. (No Charge)	AT	0.40	\$0.00	\$0.00
12/29/2023	Download, OCR, and upload Zayo's Exhibits for the 2023-01-04 Hearing to NetDocuments. (No Charge).	LJ	0.20	\$0.00	\$0.00
12/29/2023	Email Dennis the Zayo Exhibits for the 2024-01-04 Hearing. (No Charge)	AT	0.20	\$0.00	\$0.00
12/29/2023	Respond to email from Keystone Savings Bank's counsel discussing requesting continuance of Zayo stay relief hearing and document requests.	AP	0.20	\$350.00	\$70.00
01/01/2024	Review exhibits from Zayo for hearing on Motion to Lift Stay.	JP	0.30	\$575.00	\$172.50
01/01/2024	Review Zayo exhibits for hearing on Motion to Lift Stay.	JP	0.50	\$575.00	\$287.50
01/02/2024	Update the Clio calendar for the length of time for the potential hearing that is set for 10:00 A.M. on 2024-01-04.	AT	0.10	\$0.00	\$0.00

(No Charge)					
01/02/2024	Email Joe Benter with BerganKDV to follow up on my email requesting copies of any current invoices, as we are putting together a Second Application for Compensation for Debtor's Accountant to cover the time entries the first application didn't cover.	LJ	0.10	\$175.00	\$17.50
01/02/2024	Participate in Thermobond meeting.	JP	0.40	\$600.00	\$240.00
01/02/2024	Draft Joinder is Keystone Savings Bank's Motion to Continue Evidentiary Hearing.	LJ	0.10	\$175.00	\$17.50
01/02/2024	Email drafted Joinder is Keystone Savings Bank's Motion to Continue Evidentiary Hearing to Attorney Austin Peiffer for review. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/02/2024	Finalize the Joinder in Keystone Savings Bank's Motion to Continue Evidentiary Hearing.	AT	0.20	\$175.00	\$35.00
01/02/2024	File the Joinder in Keystone Savings Bank's Motion to Continue Evidentiary Hearing. (No Charge)	AT	0.10	\$0.00	\$0.00
01/02/2024	Call with the Clerk of Court's Office to respectfully request that the Joinder be reviewed as soon as possible. (No Charge)	AT	0.10	\$0.00	\$0.00
01/02/2024	Call with Attorney Austin Peiffer to let him know about the filing of the Joinder as well as the respectful request to the court regarding the Joinder. (No Charge)	AT	0.10	\$0.00	\$0.00
01/02/2024	Participate in hearing on Keystone Savings Bank's motion to continue hearing on Zayo's stay relief motion.	AP	0.70	\$365.00	\$255.50
01/02/2024	Participate in meeting with Abram Carls, Travis Armstrong, Andy Johnson, Diversified Representatives and Dennis Bruce regarding prospective purchase or investment in the company.	JP	0.80	\$600.00	\$480.00
01/02/2024	Participate in hearing on Motion to Continue Hearing on Zayo Motion to Lift Stay.	JP	0.60	\$600.00	\$360.00
01/03/2024	Emails to Unsecured Creditors Committee's counsel and client's principal discussing obtaining information for hearing on Zayo's stay relief motion.	AP	0.10	\$365.00	\$36.50
01/04/2024	Meeting with Abram Carls, Travis Armstrong, Dennis Bruce and Austin Peiffer to discuss status of case; Zayo and moving forward on budget and sales process.	JP	0.60	\$600.00	\$360.00
01/04/2024	Weekly case status update meeting with Attorney Joe Peiffer, client's principal, and Keystone Savings Bank representatives.	AP	0.60	\$365.00	\$219.00
01/04/2024	Send most recent liquidation analysis to Keystone Savings Bank in response to its request.	AP	0.10	\$365.00	\$36.50
01/04/2024	Sort and locate all the relevant correspondence regarding	AT	1.80	\$175.00	\$315.00



	the return of items from the Virginia lots.				
01/04/2024	Return call to AIS Portfolio Solutions (Ally) and learn that they will start the repossession process after 1/11/2024 due to some letter needing to expire. (No Charge).	MP	0.50	\$0.00	\$0.00
01/04/2024	Email Attorney Austin Peiffer the correspondence related to the missing and returning of property from the Virginia lots. (No Charge)	AT	0.10	\$0.00	\$0.00
01/04/2024	Research GreenState Credit Union's counsel's inquiries about pending insurance claim, repossessing pickup, and finding forklift, and draft and send response.	AP	0.90	\$365.00	\$328.50
01/04/2024	Review statements of financial affairs, proofs of claim, and documents from client to track disposition of two items client leased from Manchester Leasing Service and respond to its attorney's email inquiring about that disposition.	AP	0.90	\$365.00	\$328.50
01/04/2024	Email to Manchester Leasing Service's counsel tracing sale proceeds from items sold to Ditch Witch of Minnesota & Iowa.	AP	0.30	\$365.00	\$109.50
01/04/2024	Review and take notes on Zayo's proposed exhibits for the hearing on its stay relief motion.	AP	1.60	\$365.00	\$584.00
01/04/2024	Meeting between Attorney Joe Peiffer and Attorney Austin Peiffer comparing notes on Zayo's proposed exhibits and drafting objections.	AP	1.00	\$365.00	\$365.00
01/04/2024	File objections to Zayo's proposed exhibits. (No Charge).	AP	0.20	\$0.00	\$0.00
01/04/2024	Review Zayo exhibits.	JP	1.00	\$600.00	\$600.00
01/05/2024	Add the meeting on the calendar for Zayo's Stay Relief Motion Prep for the client, Attorney Austin Peiffer and Attorney Joseph Peiffer for Monday at 9:00 A.M. (No Charge)	AT	0.10	\$0.00	\$0.00
01/05/2024	Take call from Zayo's counsel discussing settlement offers and deposing Dennis Bruce.	AP	0.10	\$365.00	\$36.50
01/05/2024	Email to client's principal discussing Zayo's settlement offer.	AP	0.40	\$365.00	\$146.00
01/05/2024	Call with Attorney Joe Peiffer discussing Zayo's counsel's requests and arranging meetings next week for hearing preparations.	AP	0.30	\$365.00	\$109.50
01/05/2024	Respond to client's email discussing rescheduling Monday's meeting.	AP	0.10	\$365.00	\$36.50
01/05/2024	Forward Zayo's proposed amended Exhibits 6-8 to client's principal for his review.	AP	0.10	\$365.00	\$36.50
01/05/2024	Respond to Zayo's counsel's email discussing revised proposed Exhibits 6-8.	AP	0.10	\$365.00	\$36.50
01/05/2024	Respond to Zayo's counsel's email discussing deposing	AP	0.10	\$365.00	\$36.50

	client's principal.				
01/05/2024	Email to Attorney Joe Peiffer discussing Zayo's proposed deposition.	AP	0.20	\$365.00	\$73.00
01/08/2024	Finish research on discovery in contested matters and write up findings for Attorney Joe Peiffer.	AP	0.30	\$365.00	\$109.50
01/08/2024	Respond to email from Zayo's attorney discussing not withdrawing objections to proposed exhibits 6 and 7.	AP	0.30	\$365.00	\$109.50
01/08/2024	Download and save the Zayo Exhibits per Attorney Austin Peiffer's request. (No Charge)	AT	0.30	\$0.00	\$0.00
01/08/2024	Meeting with Attorney Joe Peiffer and client's proposed witnesses for next week's Zayo hearing discussing Zayo job.	AP	2.80	\$365.00	\$1,022.00
01/08/2024	Notify Attorney Austin Peiffer that the Zayo exhibits documents have been saved in the Zayo Dispute folder in the client's NetDocuments. (No Charge)	AT	0.10	\$0.00	\$0.00
01/08/2024	Review and update drafted Second Interim Application for Compensation for Debtor's Accountant and its Exhibits.	LJ	0.20	\$175.00	\$35.00
01/08/2024	Phone call between Attorney Austin Peiffer, Attorney Joe Peiffer, and the Unsecured Creditors Committee's counsel discussing Zayo hearing and discovery requests.	AP	0.70	\$365.00	\$255.50
01/08/2024	Phone call between Attorney Austin Peiffer, Attorney Joe Peiffer, and the Unsecured Creditors Committee's counsel discussing Zayo hearing and discovery requests.	JP	0.70	\$600.00	\$420.00
01/08/2024	Meeting with Attorney Austin Peiffer and client's representatives preparing for Zayo hearing next week. (Only participated part of the time.)	JP	1.00	\$600.00	\$600.00
01/08/2024	Email drafted Second Interim Application for Compensation for Debtor's Accountant to Attorney Austin Peiffer for review. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/08/2024	Email to Zayo's counsel discussing discovery requests and settlement meeting.	AP	0.20	\$365.00	\$73.00
01/09/2024	Review e-mail response by Jeff Goetz regarding meeting to settle dispute.	JP	0.10	\$600.00	\$60.00
01/09/2024	Participate in follow-up meeting with Diversity regarding its interest in acquisition of BDC.	JP	0.50	\$600.00	\$300.00
01/09/2024	Telephone call from Jeff Goetz regarding non-availability for meeting this afternoon and inquiring about tomorrow morning.	JP	0.10	\$600.00	\$60.00
01/09/2024	Review, edit, and approve second accountant fee application.	AP	0.20	\$365.00	\$73.00
01/09/2024	Email Dennis Bruce to see if he has sent payment for BDC's accountant's first fee app. (No Charge).	LJ	0.10	\$0.00	\$0.00

01/10/2024	Meet with Zayo discussing settling open invoices. Zayo parties in attendance were: Counsel—Jeff Goetz & Tim Lilwitz of Dickenson Bradshaw; Jordon Kroop, outside counsel; Brittany McNamara, in-house counsel; Businesspeople—Erick Mast, Dwight Davis and Connor Parson. BDC parties in attendance were: Businesspeople—Dennis Bruce and Kat Burgess; Counsel—Joseph Peiffer. Discussion of open invoices 4237 and 4238 on a line-by-line basis and Zayo's requests line item clarifications.	JP	1.50	\$600.00	\$900.00
01/10/2024	Meeting with Dennis Bruce and Kat Burgess after meeting with Zayo to discuss how to move forward.	JP	0.20	\$600.00	\$120.00
01/11/2024	Review newly decided case on how landlords' postpetition rent claims are treated in Chapter 11.	AP	0.20	\$365.00	\$73.00
01/11/2024	Draft and finalize the Certificate of Service for the Motions to Reject Unexpired Leases (Docs. 308 & 309), and the Order Granting Combined Motions to Reject Unexpired Leases (Doc. 337) to be mailed to Soft Dig Properties and Youngwood Lane LLC.	AT	0.50	\$175.00	\$87.50
01/11/2024	Prepare Docs. 308, 309 and 337 to be mailed out today via the USPS. (No Charge)	AT	0.30	\$0.00	\$0.00
01/11/2024	File the Certificate of Service for the Motions to Reject Unexpired Leases and the Order Granting Motion to Reject Unexpired Leases. (No Charge)	AT	0.20	\$0.00	\$0.00
01/11/2024	Telephone call from Dennis Bruce regarding the conversations with Zayo and the changes made to the last two invoices presented to Zayo in December of 2023.	JP	0.20	\$600.00	\$120.00
01/12/2024	Call with Attorney Joe Peiffer preparing for Zayo stay relief hearing, including discussing exhibits, witness testimony, and main defenses.	AP	0.90	\$365.00	\$328.50
01/12/2024	Meeting with Attorney Joe Peiffer, Zayo's representatives, and client's representatives discussing settling dispute.	AP	0.30	\$365.00	\$109.50
01/12/2024	Post-meeting follow-up with client's representatives and Attorney Joe Peiffer discussing setting up follow-up call to discuss forthcoming settlement proposal.	AP	0.10	\$365.00	\$36.50
01/12/2024	Participate in settlement meeting with Zayo.	JP	0.40	\$600.00	\$240.00
01/12/2024	Telephone call from Jeff Goetz regarding the Zayo offer.	JP	0.10	\$600.00	\$60.00
01/12/2024	Draft e-mail to client with the Zayo offer.	JP	0.10	\$600.00	\$60.00
01/12/2024	Teleconference with Attorney Joe Peiffer, client's representatives, and Zayo's representatives discussing settlement proposal.	AP	0.40	\$365.00	\$146.00
01/12/2024	Meeting with Attorney Joe Peiffer and client's representatives discussing Zayo's settlement proposal	AP	0.40	\$365.00	\$146.00

01/12/2024	Participate in settlement meeting with Zayo.	JP	0.40	\$600.00	\$240.00
01/12/2024	Participate in conference with Dennis Bruce and Kat Burgess of BDC and Austin Peiffer after second settlement meeting with Zayo.	JP	0.40	\$600.00	\$240.00
01/12/2024	Draft e-mail to Jeff Goetz requesting the breakdown on the invoices that has not been approved by Zayo so BDC can understand Zayo's position.	JP	0.10	\$600.00	\$60.00
01/12/2024	Conference with Austin Peiffer regarding planning the exhibits to use for Zayo Motion to Lift Stay.	JP	0.40	\$600.00	\$240.00
01/15/2024	Emails to opposing counsel and client discussing today's meeting between client and Zayo discussing settlement.	AP	0.20	\$365.00	\$73.00
01/15/2024	Email to client inquiring about exact details of settlement proposal.	AP	0.10	\$365.00	\$36.50
01/15/2024	Settlement discussion meeting with client's representatives and Zayo's representatives.	AP	0.40	\$365.00	\$146.00
01/15/2024	Call with client's principal reviewing Zayo settlement negotiations and discussing next steps.	AP	0.20	\$365.00	\$73.00
01/15/2024	Email to client's principal discussing ongoing negotiating posture with Zayo.	AP	0.20	\$365.00	\$73.00
01/15/2024	Email to Zayo's counsel discussing settlement status.	AP	0.80	\$365.00	\$292.00
01/15/2024	Email to Attorney Joe Peiffer discussing witness and exhibit list for hearing on Zayo's stay relief motion.	AP	0.10	\$365.00	\$36.50
01/15/2024	Review Keystone Savings Bank's motion to continue Thursday's hearing.	AP	0.10	\$365.00	\$36.50
01/15/2024	Review client's Zayo change order spreadsheet and respond to client's email discussing negotiating strategy.	AP	0.20	\$365.00	\$73.00
01/15/2024	Draft witness and exhibit list and prepare questions.	AP	2.20	\$365.00	\$803.00
01/15/2024	Call with Zayo's counsel discussing recent communications.	AP	0.10	\$365.00	\$36.50
01/15/2024	Create the exhibits for the scheduled 2024-01-18 Hearing.	AT	1.10	\$175.00	\$192.50
01/15/2024	Call with Zayo's counsel discussing settlement prospects and his responses to my last email.	AP	0.40	\$365.00	\$146.00
01/15/2024	Email to client's representatives discussing details of GuideWell's work and contract with client and Zayo's settlement position.	AP	0.90	\$365.00	\$328.50
01/16/2024	Respond to client's principal's email discussing Zayo's alleged grounds for stay relief.	AP	0.20	\$365.00	\$73.00
01/16/2024	Telephone call to Attorney Austin Peiffer regarding BDC/Zayo/Guidewell invoicing and documentation we have. (No Charge).	MP	0.20	\$0.00	\$0.00

01/16/2024	Participate in hearing on motion to continue Thursday's hearing on Zayo's stay relief motion.	AP	0.40	\$365.00	\$146.00
01/16/2024	Call with client's principal discussing payment timing for GuideWell invoices.	AP	0.10	\$365.00	\$36.50
01/16/2024	Call with Zayo's counsel discussing settlement negotiations.	AP	0.10	\$365.00	\$36.50
01/16/2024	Call with Zayo's counsel discussing possibility of bare stay relief.	AP	0.10	\$365.00	\$36.50
01/16/2024	Call with Keystone Savings Bank's counsel discussing today's hearing on its motion to continue the hearing on Zayo's stay relief motion and the possibility of a bare stay relief order.	AP	0.20	\$365.00	\$73.00
01/16/2024	Draft email to client's principal recommending accepting Zayo deal and explaining that recommendation.	AP	1.10	\$365.00	\$401.50
01/16/2024	Add Zoom Meeting calendar event for tomorrow's Continued Video Settlement Conference with Zayo. (No Charge)	AT	0.10	\$0.00	\$0.00
01/16/2024	Email to client's principal discussing options for positions to take at tomorrow's conference with Zayo and Keystone Savings Bank.	AP	0.20	\$365.00	\$73.00
01/16/2024	Draft e-mail to Dennis Bruce regarding the prudence of settling to get money quickly.	JP	0.20	\$600.00	\$120.00
01/17/2024	Emails to client and opposing counsel discussing attendance at today's 10:00 meeting.	AP	0.10	\$365.00	\$36.50
01/17/2024	Settlement meeting with Zayo's counsel, Keystone Savings Bank's counsel, and client's principal.	AP	1.00	\$365.00	\$365.00
01/17/2024	Call with client's principal discussing next steps in case and status of payroll taxes.	AP	0.30	\$365.00	\$109.50
01/17/2024	Email to Keystone Savings Bank's counsel discussing dollar amounts involved in Zayo dispute.	AP	0.30	\$365.00	\$109.50
01/17/2024	Email Dennis Bruce to follow up on previous email inquiring whether BDC has sent payment to BerganKDV for their approved fee app. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/17/2024	Email to Attorney Joe Peiffer discussing client's prospects going forward and suggested course of action.	AP	0.30	\$365.00	\$109.50
01/17/2024	Call the United States Bankruptcy Court for the Northern District of Iowa to ask if an order will be entered converting tomorrow's hearing to telephonic. Danielle will give me a call back to discuss once she is out of court. (No Charge).	LJ	0.20	\$0.00	\$0.00
01/17/2024	Receive call from Jen with the United States Bankruptcy Court for the Northern District of Iowa confirming that tomorrow's hearing will be telephonic, and that Danielle will work on submitting a proceeding memo once she's	LJ	0.10	\$0.00	\$0.00

	finished with the hearing she is attending. Message Attorney Austin Peiffer to advise. (No Charge).				
01/17/2024	Email Todd Shores and Dennis Bruce to follow up on BDC Group Inc.'s December MOR.	LJ	0.10	\$175.00	\$17.50
01/17/2024	Call with Zayo's counsel discussing settlement prospects.	AP	0.20	\$365.00	\$73.00
01/17/2024	Email Todd Shores to advise that it will be okay to submit the December MOR early next week, and request that he send copies of the bank statements before that, if possible. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/17/2024	Draft email to client's principal discussing proposed Zayo settlement.	AP	1.70	\$365.00	\$620.50
01/18/2024	Weekly status update meeting with client's principal and Keystone Savings Bank representatives.	AP	0.60	\$365.00	\$219.00
01/18/2024	Weekly status update meeting with client's principal and Keystone Savings Bank representatives.	JP	0.60	\$600.00	\$360.00
01/18/2024	Follow up meeting between Attorney Austin Peiffer, Attorney Joe Peiffer, and client's principal after weekly status update meeting.	JP	0.20	\$600.00	\$120.00
01/18/2024	Follow up meeting between Attorney Austin Peiffer, Attorney Joe Peiffer, and client's principal after weekly status update meeting.	AP	0.20	\$365.00	\$73.00
01/18/2024	Email to Zayo's counsel discussing timing of today's hearing and computing amount to be paid to client's subcontractors upon receipt of Zayo's payment.	AP	0.10	\$365.00	\$36.50
01/18/2024	Email to Keystone Savings Bank's counsel discussing settlement terms client has consented to.	AP	0.10	\$365.00	\$36.50
01/18/2024	Call with Zayo's counsel discussing settlement negotiations.	AP	0.10	\$365.00	\$36.50
01/18/2024	Compile list of disputed GuideWell invoices included in its mechanic's liens.	AP	0.40	\$365.00	\$146.00
01/18/2024	Call with Zayo's counsel discussing disputed GuideWell invoices; assemble and send those invoices to him.	AP	0.10	\$365.00	\$36.50
01/18/2024	Review financial statements, budget, and ODS executive report client's principal sent and return comments.	AP	0.40	\$365.00	\$146.00
01/18/2024	Participate in telephonic status hearing on Zayo's stay relief motion.	AP	0.20	\$365.00	\$73.00
01/18/2024	Respond to client's principal's email discussing consolidating equipment, DIP personal guaranties, and results of today's hearing.	AP	0.20	\$365.00	\$73.00
01/18/2024	Review Keystone Savings Bank's counteroffer to Diversity and inform client I'll be on tomorrow's call with Diversity.	AP	0.10	\$365.00	\$36.50

01/19/2024	Respond to United States Trustee's office's inquiry about the monthly report and bank statements.	AP	0.10	\$365.00	\$36.50
01/19/2024	Email Attorney Austin Peiffer to advise that Todd Shores indicated he would work on the December MOR this weekend or early next week. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/22/2024	Call with Zayo's counsel discussing outlines of a consensual resolution to its stay relief motion.	AP	0.10	\$365.00	\$36.50
01/22/2024	Call between Attorney Austin Peiffer and Attorney Joe Peiffer discussing status of Zayo settlement and scheduling meeting with client's principal tomorrow.	JP	0.10	\$600.00	\$60.00
01/22/2024	Call between Attorney Austin Peiffer and Attorney Joe Peiffer discussing status of Zayo settlement and scheduling meeting with client's principal tomorrow.	AP	0.10	\$365.00	\$36.50
01/22/2024	Respond to client regarding workmen's compensation audit and paying premium.	JP	0.10	\$600.00	\$60.00
01/22/2024	Respond to Dennis's e-mail regarding withholding taxes and completion of jobs given imminent conversion to Ch. 7.	JP	0.10	\$600.00	\$60.00
01/22/2024	Call with Zayo's counsel discussing agreed-upon terms for stay relief stipulation.	AP	0.10	\$365.00	\$36.50
01/22/2024	Draft proposed stipulated order granting Zayo stay relief as well as joint motion to authorize the debtor to participate in mediation and the corresponding proposed order, then circulate to opposing counsel for comments, changes, and approval.	AP	1.00	\$365.00	\$365.00
01/23/2024	Email Todd Shores to follow up on the December MOR and bank statements. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/23/2024	Email Todd Vandenberg to advise that we haven't received the December MOR or bank statements yet, but that I will send as soon as they are received. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/23/2024	Download, OCR, rename, redact, and upload bank statements received from Todd Shores to NetDocuments. (No Charge).	LJ	0.30	\$0.00	\$0.00
01/23/2024	Email copies of KSB bank statements received from Todd Shores to Todd Vandenberg.	LJ	0.10	\$175.00	\$17.50
01/23/2024	Email Todd Shores to confirm receipt of the KSB bank statements and ask if he has a copy of the MWO statement as well. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/23/2024	Draft letter to MWO Bank requesting a copy of BDC Group Inc's December 2023 bank statement.	LJ	0.10	\$175.00	\$17.50
01/23/2024	Fax Letter requesting a copy of BDC Group Inc's December 2023 bank statement to MWO Bank. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/23/2024	Scan and save the Ally letter re BDC truck sale. Send to	AT	0.10	\$0.00	\$0.00

	Attorney Austin Peiffer and Attorney Joseph Peiffer. (No Charge)				
01/23/2024	Respond to United States Trustee's office's email discussing balances on deposit at Keystone Savings Bank.	AP	0.10	\$365.00	\$36.50
01/23/2024	Email to client's principals and Kyestone Savings Bank's counsel discussing deposit balances at Keystone Savings Bank.	AP	0.10	\$365.00	\$36.50
01/23/2024	Email a copy of the Ally letter re Plan to Sell that we received today in the mail per Attorney Austin Peiffer's request. (No Charge)	AT	0.10	\$0.00	\$0.00
01/23/2024	Email to client's principal discussing Zayo's request for cooperation on retrieving materials and narrowing disputed invoices to disputed and undisputed portions.	AP	0.10	\$365.00	\$36.50
01/23/2024	Call between Attorney Joe Peiffer, Attorney Austin Peiffer, and client's principals discussing Keystone Savings Bank deposit balances, timing of DIP draws and subsequent payments, Zayo's stay relief request, payroll and other taxes, and path forward in case.	AP	0.80	\$365.00	\$292.00
01/23/2024	Telephone call to Dennis Bruce, Todd Shores and Austin Peiffer regarding excess balances in Keystone Accounts and amount of unpaid responsible person taxes.	JP	0.80	\$600.00	\$480.00
01/23/2024	Call with Keystone Savings Bank's counsel discussing arranging a meeting tomorrow.	AP	0.10	\$365.00	\$36.50
01/23/2024	Calls with Keystone Savings Bank representative, Attorney Joe Peiffer, and client's principal discussing arranging meeting tomorrow.	AP	0.10	\$365.00	\$36.50
01/23/2024	Respond to Unsecured Creditors Committee's counsel's email discussing the mediation motion and the Zayo stay relief order.	AP	0.20	\$365.00	\$73.00
01/23/2024	Finalize and submit proposed stipulated order granting Zayo's stay relief motion.	AP	0.20	\$365.00	\$73.00
01/24/2024	Status update meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank representatives discussing payroll taxes and options for proceeding forward.	AP	0.30	\$365.00	\$109.50
01/24/2024	Email to Attorney Joe Peiffer discussing additional timing consideration related to expected case progress.	AP	0.10	\$365.00	\$36.50
01/24/2024	Meet with Eric Lam, Travis Schroeder, Andy Johnson, Dennis Bruce, Todd Shores and Austin Peiffer to discuss outstanding payroll tax issues; discussion of WIP to be turned into AR and discussion of conversion to Chapter 7.	JP	0.30	\$600.00	\$180.00
01/24/2024	Participate in Zayo dispute resolution settlement conference call with counsel for Zayo and Keystone Savings Bank.	AP	0.40	\$365.00	\$146.00



01/24/2024	Call with Keystone Savings Bank's counsel discussing depositing Zayo payment and keeping deposits under FDIC insurance limits.	AP	0.20	\$365.00	\$73.00
01/24/2024	Emails to client's principals and Keystone Savings Bank's counsel discussing how the Zayo payment should be handled and releasing funds to pay taxes.	AP	0.40	\$365.00	\$146.00
01/24/2024	Emails to Keystone Savings Bank's counsel and client's principals coordinating Zayo ACH payment form completion and discussing tax payments.	AP	0.20	\$365.00	\$73.00
01/24/2024	Submit ACH form and supporting documentation to Zayo.	AP	0.20	\$365.00	\$73.00
01/24/2024	Telephone call to Dennis Bruce regarding Keystone's response to request to pay responsible person taxes.	JP	0.10	\$600.00	\$60.00
01/25/2024	Draft e-mail to Eric Lam, attorney for Keystone Savings Bank, regarding payment of the Responsible Person Taxes and conversion of WIP into ARs for the benefit of Keystone Savings Bank.	JP	0.10	\$600.00	\$60.00
01/25/2024	Draft e-mail to Eric Lam regarding the Payment Request from January 19th that included the request to pay the insurance, the Notice of Cancellation and the Insurance Invoice.	JP	0.10	\$600.00	\$60.00
01/25/2024	Review e-mail from Eric Lam and forward it to Dennis Bruce to answer the questions posed by Eric Lam.	JP	0.10	\$600.00	\$60.00
01/25/2024	Telephone call to Dennis Bruce regarding insurance on equipment and operations.	JP	0.10	\$600.00	\$60.00
01/25/2024	Telephone call to True North representative regarding insurance on equipment and operations given fact that the premium was not paid by January 24, 2024.	JP	0.10	\$600.00	\$60.00
01/25/2024	Telephone call to Dennis Bruce requesting that he follow up with the insurance company representatives provided by the True North representative.	JP	0.10	\$600.00	\$60.00
01/25/2024	Telephone call to Dennis Bruce after receipt of Notice of Default regarding DIP and other matters and freezing of accounts; discussion of next steps.	JP	0.20	\$600.00	\$120.00
01/26/2024	Call between Attorney Joe Peiffer, Attorney Austin Peiffer, and the Unsecured Creditors Committee's counsel discussing case status, Keystone Savings Bank's stay relief motions, its collateral position, converting the case, and other necessary actions.	AP	0.80	\$365.00	\$292.00
01/26/2024	Call with client's principal obtaining consent to file motion to convert to Chapter 7 and discuss Chapter 7 conversion process.	AP	0.20	\$365.00	\$73.00
01/26/2024	Draft motion to expedite hearing on motion to convert to Chapter 7 & stay pending deadlines along with corresponding proposed, and make corresponding edits to	AP	1.70	\$365.00	\$620.50

the motion to convert to Chapter 7.

01/27/2024	Research and revise motion to convert, motion to expedite, and motion to stay and corresponding proposed orders to incorporate issues raised in opposing counsel's emails.	AP	1.40	\$365.00	\$511.00
01/27/2024	Draft WARN Act Notice documents for employees and send to Iowa Workforce Development.	JP	0.50	\$600.00	\$300.00
01/29/2024	Finalize motion to convert and send it and associated motions and proposed orders to assistant for filing.	AP	0.30	\$365.00	\$109.50
01/29/2024	Finalize the 2024-01-29 Motion to Convert in preparation for filing.	AT	0.10	\$175.00	\$17.50
01/29/2024	Finalize the Motion to Expedite Hearing on Motion to Convert; and Shorten Notice of Hearing.	AT	0.10	\$175.00	\$17.50
01/29/2024	File the Motion to Convert Case to Chapter 7 with the Court. (No Charge)	AT	0.20	\$0.00	\$0.00
01/29/2024	Email Dennis Bruce to request a picture of his signature for the WARN Act Notices. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/29/2024	Copy final version of WARN Act Notice to BDC Group Inc.'s letterhead and adjust formatting so it fits on a single page.	LJ	0.10	\$175.00	\$17.50
01/29/2024	File the Motion to Expedite Hearing on Motion to Convert; and Shorten Notice of Hearing with the Court. (No Charge)	AT	0.20	\$0.00	\$0.00
01/29/2024	Finalize the Proposed Order Granting Motion to Expedite Hearing on Motion to Convert and Shortening Notice of Hearing that will be submitted to the Court.	AT	0.10	\$175.00	\$17.50
01/29/2024	Email a copy of the WARN Act Notice on BDC Group Inc.'s letterhead to Dennis Bruce. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/29/2024	File the Proposed Order as a support document to the Motion to Expedite Hearing with the Court. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Call with ECICOG's attorney discussing stipulating to stay relief to allow it to pick up its remaining collateral.	AP	0.20	\$365.00	\$73.00
01/29/2024	Call with client's principal discussing creditors and other parties in interest picking up equipment, drafting equipment location lists, and other conversion issues.	AP	0.20	\$365.00	\$73.00
01/29/2024	Call with Zayo's counsel discussing motion to convert.	AP	0.10	\$365.00	\$36.50
01/29/2024	Email the Proposed Order Granting Motion to Expedite Hearing on Motion to Convert and Shortening Notice of Hearing to the Court for their review. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Finalize the Motion to Stay Case Deadlines Pending Chapter 7 Trustee Appointment to be filed with the Court.	AT	0.10	\$175.00	\$17.50
01/29/2024	File the Motion to Stay Deadlines Pending Chapter 7	AT	0.20	\$0.00	\$0.00

Trustee Appointment with the Court. (No Charge)					
01/29/2024	Finalize the Proposed Order Staying Case Deadlines Pending Chapter 7 Trustee Appointment to be filed as a Support Document to the Motion to Stay Case Deadlines as well as be submitted to the Court.	AT	0.10	\$175.00	\$17.50
01/29/2024	Email to Attorney Joe Peiffer outlining this morning's case developments and requesting his input on dealing with secured creditors.	AP	0.10	\$365.00	\$36.50
01/29/2024	File support document (Proposed Order Staying Deadlines) with the Court. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Submit (via email) the Proposed Order Staying Deadlines to the Court for Judge Collins to review in both Word and PDF format. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Email the file-stamped versions of all the documents that we filed today with the court. (No Charge)	AT	0.20	\$0.00	\$0.00
01/29/2024	Notify the Court of Attorney Joseph Peiffer's unavailability for the potential different date of the Hearing on the Motion to Expedite Hearing. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Download and save the file-stamped documents that we filed today to be mailed to Liz Janczak today due to email issues on her end. (No Charge)	AT	0.10	\$0.00	\$0.00
01/29/2024	Prepare mail merge for envelopes to be used for the WARN Act Notices.	LJ	0.10	\$175.00	\$17.50
01/29/2024	Print envelopes for WARN Act Notices.	LJ	0.50	\$175.00	\$87.50
01/29/2024	Take call from prospective Chapter 7 trustee discussing case status and information she needs initially.	AP	0.50	\$365.00	\$182.50
01/29/2024	Emails to client's principal and prospective Chapter 7 trustee discussing prospective Chapter 7 trustee's questions and general case information.	AP	1.80	\$365.00	\$657.00
01/29/2024	Email Dennis Bruce to follow up on my request for his signature for the WARN Act Notices. (No Charge).	LJ	0.10	\$0.00	\$0.00
01/29/2024	Print POC Instructions and POC Form 410 to be included with WARN Act Notices, organize, and prepare to be mailed.	LJ	0.40	\$175.00	\$70.00
01/29/2024	Search NetDocuments for any information we have related to the notice of insurance cancellation from TrueNorth and email to Renee Hanrahan.	LJ	0.30	\$175.00	\$52.50
01/29/2024	Telephone call from Abram Carls regarding status of case and discussion regarding having the computer data backed up.	JP	0.10	\$600.00	\$60.00
01/29/2024	Review letter from Louis Hockenberry regarding unpaid rent to Galinsky Family Real Estate, LLC.	JP	0.10	\$600.00	\$60.00

01/29/2024	Email Dennis the Letter and Notice that we received in the mail today. (No Charge)	AT	0.10	\$175.00	\$17.50
01/29/2024	Read US Trustee's Brief and begin research in preparation for writing a responsive brief.	JP	1.00	\$600.00	\$600.00
01/29/2024	Locate and email copies of BDC Group Inc.'s contracts with Mediacom and the City of Cedar Rapids to Renee Hanrahan.	LJ	0.20	\$175.00	\$35.00
01/30/2024	Prepare mail merge of WARN Act Notices.	LJ	0.20	\$175.00	\$35.00
01/30/2024	Draft e-mail to Renee Hanrahan regarding response to her inquiry by Dennis Bruce and Todd Shores.	JP	0.10	\$600.00	\$60.00
01/30/2024	Respond to e-mail from Rush Shortley regarding not operating business in light of bank freezing account and insurance termination.	JP	0.10	\$600.00	\$60.00
01/30/2024	Telephone call to Randy Erb at True North regarding status of insurance coverage.	JP	0.10	\$600.00	\$60.00
01/30/2024	Fold, stuff envelopes, and prepare WARN Act Notices to be mailed. (No Charge).	LJ	0.50	\$0.00	\$0.00
01/30/2024	Send Response Email to Renee Hanrahan discussing DIP Financing Agreement and clarification on Converting over Dismissing.	AP	0.50	\$365.00	\$182.50
01/30/2024	Email to client inquiring if he can provide the last payroll report in response to Renee Hanrahan's request for information regarding payroll.	AP	0.10	\$365.00	\$36.50
01/30/2024	Email to Michael Kossack regarding client's Motion to Convert with reorganization to a Chapter 7 Bankruptcy as well as inform him of his opportunity to file a proof of claim.	AP	0.10	\$365.00	\$36.50
01/30/2024	Prepare WARN Act Notices to be emailed to all individuals.	LJ	0.30	\$175.00	\$52.50
01/30/2024	Draft Letter to IWD re Notice of Closing.	LJ	0.20	\$175.00	\$35.00
01/30/2024	Participate in hearing on Motion to Convert and Motion for Stay filed by Debtor; Bank and Deere Motions to Lift Stay.	JP	0.90	\$600.00	\$540.00
01/30/2024	Review pleadings and prepare for hearing on Motion to Convert and Motion for Stay filed by Debtor and read pleadings filed by other counsel in case.	JP	0.70	\$600.00	\$420.00
01/30/2024	Review and approve Keystone Savings Bank's Order to Lift Stay as amended by Unsecured Creditor's Committee Counsel.	JP	0.10	\$600.00	\$60.00
				<b>Services Subtotal</b>	<b>\$62,042.00</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	10/30/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	10/31/2023	Mail the schedule amendments that came back previously as returned mail to the new addresses for the creditors listed.	6.00	\$2.79	\$16.74
Expense	10/31/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	11/01/2023	Mailing service charge: Notice of Second ABLs Fee App.	1.00	\$7.28	\$7.28
Expense	11/07/2023	Mailing service fee for BDC Notice of Accountant's 1st Fee App.	1.00	\$7.28	\$7.28
Expense	11/07/2023	Mail out previously returned schedule amendments to new creditors addresses.	2.00	\$2.79	\$5.58
Expense	11/07/2023	Mail out the returned mail that came today to the creditor's updated address.	1.00	\$2.79	\$2.79
Expense	11/08/2023	Printing expense: Letter to Herc Rentals for Automatic Stay Violation.	12.00	\$0.20	\$2.40
Expense	11/08/2023	Certified Mail Fee for Stay Violation Letter to Herc Rentals.	1.00	\$5.25	\$5.25
Expense	11/10/2023	Mail letter from ABLs to Soft Dig Properties, LLC regarding automatic stay violation at their three locations per Attorney Austin Peiffer's request.	3.00	\$41.25	\$123.75
Expense	11/10/2023	Print the letter from ABLs to Soft Dig Properties, LLC.	6.00	\$0.50	\$3.00
Expense	11/10/2023	Print the Attachments for the letter from ABLs to Soft Dig Properties, LLC that were mailed out today.	9.00	\$0.20	\$1.80
Expense	11/27/2023	Mail out the Schedule Amendments and Notice of Schedule Amendments to the updated address for creditor Marlin Business Bank via the USPS.	1.00	\$2.55	\$2.55
Expense	12/01/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	12/06/2023	Mail out the returned Schedule Amendment mail to the new updated address for creditor Complete Design Solutions LLC.	1.00	\$2.55	\$2.55
Expense	12/07/2023	Copy expense for printing Motions to Reject Unexpired Leases (Docs. 308 & 309) to be mailed as described in their Certificates of Service.	3.00	\$0.20	\$0.60
Expense	12/07/2023	Copy expense for printing Combined Notice of Motions to Reject Leases (Doc. 310) to be mailed to the Master Service List, Soft Dig Properties, LLC, and Youngwood Lane LLC.	9.00	\$0.20	\$1.80
Expense	12/07/2023	Postage expense for mailing Motion to Reject Unexpired Lease (Doc. 308) and Combined Notice of Motions to Reject Leases (Doc. 310) to Soft Dig Properties, LLC.	2.00	\$0.66	\$1.32
Expense	12/07/2023	Postage expense for mailing Motion to Reject Unexpired Lease (Doc. 309) and Combined Notice of Motions to	1.00	\$0.66	\$0.66

## Reject Leases (Doc. 310) to Youngwood Lane LLC.

Expense	12/07/2023	Postage expense for mailing Combined Notice of Motions to Reject Leases (Doc. 310) to the Master Service List.	6.00	\$0.66	\$3.96
Expense	12/08/2023	Mail out the returned mail of Schedule Amendments and Notice of Schedule Amendments to creditor Leonardo Meza Jr's updated address.	1.00	\$2.79	\$2.79
Expense	12/13/2023	Mail out the Schedule Amendments and the Notice of Schedule Amendments to Creditors Coastal Communications, and JJJ Cable Communications LLC from their previous returned mail to their updated addresses.	2.00	\$2.79	\$5.58
Expense	12/15/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	01/11/2024	Print out two copies of the Motion to Reject Unexpired Leases (Doc. 308), Motion to Reject Unexpired Leases (Doc. 309), and the three copies of the Order Granting the Motions to Reject Unexpired Leases to be mailed out to Soft Dig Properties and Youngwood Lane LLC.	6.00	\$0.20	\$1.20
Expense	01/11/2024	Mail out the two copies of the Motion to Reject Unexpired Leases (Doc. 308), Motion to Reject Unexpired Leases (Doc. 309), and the three copies of the Order Granting the Motions to Reject Unexpired Leases to be mailed out to Soft Dig Properties and Youngwood Lane LLC.	3.00	\$0.66	\$1.98
Expense	01/29/2024	File the Motion to Convert Case to Chapter 7 with the Court.	1.00	\$15.00	\$15.00
Expense	01/30/2024	Copy expense for printing POC Instructions and POC Form 410 to be mailed with the WARN Act Notices.	105.00	\$0.20	\$21.00
Expense	01/30/2024	Copy expense for printing WARN Act Notices.	35.00	\$0.50	\$17.50
Expense	01/30/2024	Postage expense for mailing WARN Act Notices.	35.00	\$0.68	\$23.80
Expense	01/30/2024	Copy expense for printing letter to IWD re Notice of Closing.	4.00	\$0.50	\$2.00
Expense	01/30/2024	Copy expense for printing enclosure to letter to IWD re Notice of Closing.	2.00	\$0.20	\$0.40
Expense	01/30/2024	Postage expense for mailing letter to IWD re Notice of Closing.	2.00	\$0.68	\$1.36
Expenses Subtotal					\$321.92

Time Keeper	Position	Quantity	Rate	Total
Yara Halloush	Attorney	0.4	\$405.00	\$162.00
Austin Peiffer	Attorney	42.0	\$365.00	\$15,330.00
Austin Peiffer	Attorney	45.3	\$350.00	\$15,855.00

Austin Peiffer	Attorney	0.8	\$0.00	\$0.00
Joseph Peiffer	Attorney	16.8	\$600.00	\$10,080.00
Joseph Peiffer	Attorney	27.7	\$575.00	\$15,927.50
Susan Daves	Senior Paralegal	0.6	\$170.00	\$102.00
Leah Johnson	Paralegal	3.0	\$175.00	\$525.00
Leah Johnson	Paralegal	5.3	\$170.00	\$901.00
Leah Johnson	Paralegal	5.5	\$0.00	\$0.00
Mike Peiffer	Non-Attorney	4.1	\$170.00	\$697.00
Mike Peiffer	Non-Attorney	0.5	\$85.00	\$42.50
Mike Peiffer	Non-Attorney	2.3	\$0.00	\$0.00
Keith Starr	Chief Financial Strategist	0.3	\$290.00	\$87.00
Alex Tvedte	Legal Assistant	4.2	\$175.00	\$735.00
Alex Tvedte	Legal Assistant	9.4	\$170.00	\$1,598.00
Alex Tvedte	Legal Assistant	10.7	\$0.00	\$0.00
			<b>Subtotal</b>	<b>\$62,363.92</b>
			<b>Total</b>	<b>\$62,363.92</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
2512	10/24/2023	\$103,810.17	\$73,017.51	\$30,792.66

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
2669	03/27/2024	\$62,363.92	\$0.00	\$62,363.92
<b>Outstanding Balance</b>				<b>\$93,156.58</b>
<b>Total Amount Outstanding</b>				<b>\$93,156.58</b>

**Trust Account**

Date	Type	Notes	Matter	Receipts	Payments	Balance
03/27/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$25,000.00	\$25,000.00
04/14/2023		Payment for bill #2305 (T2984).	6394.00001-BDC - Chapter 11 Bankruptcy	\$7,498.50		\$17,501.50
04/18/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$7,498.50	\$25,000.00
05/15/2023		Payment for bill #2344 (T3010).	6394.00001-BDC - Chapter 11 Bankruptcy	\$4,051.00		\$20,949.00
05/22/2023	Wire Transfer	Wire transfer from BDC Group, Inc. for trust deposit.			\$78,001.00	\$98,950.00
06/13/2023		Payment for bill #2377 (ACH).	6394.00001-BDC - Chapter 11 Bankruptcy	\$28,313.50		\$70,636.50
07/28/2023	Wire	Wire from BDC Group for trust deposit.			\$10,000.00	\$80,636.50
08/04/2023	Wire	Wire from BDC Group Inc for trust deposit.			\$10,000.00	\$90,636.50
08/11/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$100,636.50
08/18/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$110,636.50
08/24/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$120,636.50
08/30/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$130,636.50
09/06/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$140,636.50
09/08/2023		Payment for bill #2435 (T3103).	6394.00002-BDC - Postpetition	\$68,064.89		\$72,571.61
09/22/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$82,571.61
09/29/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$10,000.00	\$92,571.61
10/13/2023	Wire	Wire from BDC Group,			\$10,000.00	\$102,571.61



Inc. for trust deposit.				
10/20/2023	Wire	Wire from BDC Group for trust deposit.	\$10,000.00	\$112,571.61
10/27/2023	Wire	Wire from BDC group for trust deposit.	\$10,000.00	\$122,571.61
10/31/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$132,571.61
12/01/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$142,571.61
12/12/2023		Partial payment for bill #2512 (T3182).	6394.00002-BDC - Postpetition \$71,935.11	\$70,636.50
12/15/2023	Wire	Incoming wire from BDC Group, Inc.	\$10,000.00	\$80,636.50
12/15/2023		Payment for bill #2512 (T3198).	6394.00002-BDC - Postpetition \$1,082.40	\$79,554.10
02/07/2024	Check	23-484 In Re: BDC Group, Inc. Pre-Petition Retainer Funds.	\$70,636.50	\$8,917.60
02/07/2024	Check	23-484 In Re: BDC Group, Inc. Post-Petition Retainer Funds.	\$8,917.60	\$0.00
Trust Account Balance			\$0.00	

Please make all amounts payable to: Ag & Business Legal Strategies

Payment is due upon receipt.